

# LBS Privacy Policy and Notice

## 1 Introduction

LBS (the company) aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, LBS has this privacy policy statement that explains what personal data we collect, how we use and store this personal data, and with whom we may share it. It is a public statement of how our organization applies data protection principles to the processing of private data; its goal is to be a clear and concise document that is accessible by individuals.

This privacy statement is available on the company's website and copies will also be made available on request (see "Subject access requests (SARs)" below).

LBS also maintains a data protection policy, which is an internal document for our employees that goes into detail about data protection objectives, responsibilities, and how to handle violations.

Note: In general, terms used herein have their common meanings; where unclear, refer to the published definitions in Article 4: Definitions in the EU's GDPR (General Data Protection Regulation) at:

<https://gdpr-info.eu/art-4-gdpr/> .

## 2 Website

You can use our website without disclosing your personal data. However, providing your personal data might be necessary if you request certain services or information from us, such as the downloading of a case study or white paper, asking for an appointment at an event, asking for more information about our products and/or services, or requesting product support; by voluntarily making such a request, you provide your consent for collection of the personal data necessary to fulfill that request.

### 2.1 What personal data are collected and processed, on which legal basis, and for which purposes?

We collect, process, and use your personal data for the purposes of providing you with information or services that you request, which may include information about our products/services, educational/reference materials, information describing use and management of our web site, or technical support.

**Consent** – When you visit our website, you may voluntarily choose to provide us with information about yourself (such as your name, country/state/province, e-mail address, and phone number) that we need to correspond with you or to give you access to information. Unless otherwise permitted by applicable data protection laws, we will not collect any personal data about you unless you voluntarily choose to provide us with it (e.g., by registration, by completion of contact forms, or via e-mails). You have the right to withdraw your consent to this at any time.

**Support** – When you submit a request for technical support assistance you voluntarily choose to provide us with information about yourself (such as your name, country/state/province, e-mail address, phone number, company, and product information) that we need to correspond with you regarding your request. You also provide us information about your request that may include data about software installations and/or hardware configurations, as well as error logs or tracking files.

**Regulatory** – Sometimes, we must retain or process your information in order to comply with a regulatory obligation. For example, we may be required to maintain lists and contact information for purchasers or users of regulated medical devices/products to allow notification of such users in the event of a safety or operational issue in the public interest. Such lists may include product information, plus personal information, such as your name, country/state/province, e-mail address, phone number, and company. An individual may have their name removed from such lists by providing another responsible party as the designated contact person.

## 2.2 Who has access to your personal data and to whom is your personal data transferred?

Access to your personal data is restricted to authorized users. Be assured that we will not distribute or sell your personal data to third parties, without your permission to do so. We have never sold personal data and at this time we have no intentions of ever doing so.

## 2.3 Protection

We strive to have in place appropriate technical and organizational means to protect your information in our possession. However, you understand that in providing your personal data over public networks, you do so at your own risk.

## 2.4 Marketing: What about commercial e-mails?

In relation to commercial e-mails that promote our products and services, we shall not use your personal data to send unsolicited commercial e-mails, unless you have given your consent to receive such e-mails.

At any time, you will have the right to withdraw your consent for any direct marketing purposes. You can communicate this by unsubscribing from our e-newsletter or other marketing correspondence directly in the e-newsletter itself, by email, or by letter addressed to our corporate offices.

## 2.5 Retention: How long may we retain your personal data?

We store your personal data only as long as necessary for the fulfilment of the purposes for which it has been collected or as required by law. For personal data stored for marketing purposes, the retention period shall depend of the shelf life of the product(s) or service(s) for which they were collected. For personal data stored for regulatory tracking purposes, the data is retained for as long as the covered product remains registered to the purchaser.

## 2.6 Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note and be aware that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide while visiting such sites; further, such sites are not governed by this privacy statement. You should exercise appropriate caution and look at the privacy statement applicable to the website in question.

# 3 Your Rights under the GDPR

The EU General Data Protection Regulation (GDPR) law requires us to tell individuals about their rights and our obligations to them in regard to the processing and control of their personal data. We do this now -- by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org) . In addition, we provide below a summary overview of your eight key rights.

Every citizen of the EU has the following eight rights with respect to the personal data held or used:

1. the right to be informed  
(about: what information is being used, how it is used, for how long it is used, and your rights)
2. the right to access  
(to see it)

3. the right to rectification  
(to be able to correct it if incorrect)
4. the right to have it erased once there is no longer a legitimate basis to use it  
(the right to be forgotten)
5. the right to restrict processing  
(to limit its use)
6. the right to data portability  
(to be able to share the information with other organizations)
7. the right to object to use  
(to control its use)
8. rights regarding automated decision making and profiling  
(the right to obtain human intervention)

## 4 Subject access requests (SARs)

All individuals (subjects) who are included in personal data held by LBS are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the company is meeting its data protection obligations.

If an individual contacts LBS requesting any of this information, this is called a subject access request (SAR).

Subject access requests from individuals should be made by email, addressed to the security officer or data controller at [info@laurelbridge.com](mailto:info@laurelbridge.com). The data controller may supply a standard request form, although individuals do not have to use this form to receive info.

Individuals may be charged per subject access request. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before delivering or handing over any information.

## 5 Disclosing data for other reasons

In certain circumstances, the law allows or requires personal data to be disclosed to government or law enforcement agencies without the consent of the data subject.

Under these circumstances, the company will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the company's management team and from the company's legal advisers where necessary.

## 6 Where is your personal data processed?

Our website is located in the United States of America. Your personal data may also be hosted by a third party who acts on our behalf and is responsible to us. Our corporate offices are located at:

**Laurel Bridge Software, Inc.**  
500 Creek View Road, Suite 200  
Newark, DE (Delaware) 19711 USA  
Web site: [www.laurelbridge.com](http://www.laurelbridge.com)  
Info: [info@laurelbridge.com](mailto:info@laurelbridge.com)  
Telephone: +1-302-453-0222

## 7 Sending a message to our support team

When you contact us, whether by telephone, through our website, or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business and organization.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

## 8 Modifications of this privacy notice

We reserve the right to modify this privacy notice without explicit prior notice. Your only notice of such modification shall be the posting of the modified privacy notice on the company web site. You are encouraged to review this privacy notice regularly.

# LBS Cookie Statement

## 1 Overview

This Cookie Statement explains how Laurel Bridge Software (LBS) uses cookies and similar technologies in the course of our business, including through our websites that link to this Cookie Statement.

It explains what these technologies are and why we use them, as well as your rights to control our use of them. This Cookie Statement is and will be treated as part of our Terms of Use and is automatically incorporated therein. Capitalized terms used and not otherwise defined in this Cookie Statement have the meanings given to those terms in our Privacy Policy.

In some cases, we may use cookies and other tracking technologies described in this Cookie Statement to collect Personal Information, or to collect information that becomes Personal Information if we combine it with other information. For more information about how we handle and process your Personal Information, please consult our Privacy Policy.

## 2 What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by online service providers in order to (for example) make their websites or services work, or to work more efficiently, as well as to provide reporting information.

Cookies set by the website owner or service provider (in this case, LBS) are called “first-party cookies”. Cookies set by parties other than the website owner are called “third-party cookies”. Third-party cookies enable third-party features or functionality to be provided on or through the website or service you are using (such as advertising, interactive content, and analytics). The third parties that set these third-party cookies can recognize your computer both when it visits the website or service in question and also when it visits certain other websites or services.

## 3 Why do we use cookies and other tracking technologies?

We use first-party and third-party cookies for several reasons. Some cookies are required for technical reasons in order for our websites and services to operate, and we refer to these as “essential” or “strictly necessary” cookies. Other cookies enable us and the third-parties we work with to track and target the interests of visitors to our websites, and we refer to these as “performance” or “functionality” cookies. For example, we may use cookies to tailor content and information that we may send or display to you and otherwise personalize your experience while interacting with our websites and to otherwise improve the functionality of the services we provide. Third-parties may serve cookies through our websites and services for advertising, analytics, and other purposes. This is described in more detail below.

## 4 Managing Cookies

Most browsers allow you to refuse to accept cookies and to delete cookies via the browser’s configuration options. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via your browser’s main support web site. You may read more about cookies and managing their use at: <https://cookies.insites.com> or at: <http://www.allaboutcookies.org/manage-cookies/index.html> or at many other similar sites.

## 5 We use the following cookies

- **Essential or strictly necessary cookies.** These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you to log into secure areas of our website. Because these cookies are strictly necessary to deliver the websites, you cannot refuse them without impacting how our websites function. You can block or delete them by changing your browser settings, as described above under the heading "Managing Cookies"; if you do this, certain functionality may become unavailable.
- **Analytical cookies.** These cookies collect information that is used either individually or in aggregate form to help us understand how our websites are being used. They allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users find what they are looking for easily or to help us customize our websites and applications for you in order to enhance your experience.
- **Functionality or performance cookies.** These are used to recognize you when you return to our website. This enables us to personalize our content for you, greet you by name, or remember your preferences. These cookies are used to enhance the performance and functionality of our websites but are not essential to their use. However, without these cookies, certain functionality may become unavailable.
- **Targeting or advertising cookies.** These cookies may record your visit to our website, the pages you have visited, and/or the links you have followed. We will use this information to make our website more relevant to your interests. We may also share this information with third parties for this purpose. At this time, we do not post advertising on our website(s).

You can find more information about the individual cookies we use and the purposes for which we use them in the table below. These apply to the

- Corporate website: <https://www.laurelbridge.com>
- License website: <https://www.laurelbridge.com/login.php>

Category	Cookies	Comments
Essential or strictly necessary cookies		These are cookies that are required for the operation of our websites.
Corporate website	<b>Cookies used:</b> <ul style="list-style-type: none"><li>• PHPSESSID – tracks PHP session</li><li>• pum-<i>nnnn</i> – a timing cookie for controlling display of an introductory pop-up on site entry, where <i>nnnn</i> is a numeric value.</li></ul>	

Category	Cookies	Comments
License website	<p><b>Cookies used for public users:</b></p> <ul style="list-style-type: none"> <li>• keys_col_order – records user preferences for the column display</li> <li>• lbs_TEST* - various, used for test of GUI usage authorization, where * represents an ID string, e.g.: lbs_TESTAUTHCHECK lbs_TESTAUTHCHECK2 lbs_TEST_AUTH1 lbs_TEST_AUTH2</li> <li>• lbs_session_timeout – controls auto logout after an idle period</li> <li>• lbs_user_name – records user name in the event the user specifically requests that the browser maintain that data</li> </ul> <p><b>Cookies used for private, privileged users:</b></p> <ul style="list-style-type: none"> <li>• screenDisabledCompanyKeys – controls GUI viewing preference</li> <li>• screenDisabledKeys – controls GUI viewing preference</li> </ul>	<p>Role-based user login is required for access to the license site.</p> <ul style="list-style-type: none"> <li>• There are limited tracking cookies for public (external) users.</li> <li>• There are additional tracking cookies for private, privileged (internal) users.</li> </ul>
Analytical cookies		These cookies collect information that is used to help us understand how our websites are being used.
Both Corporate and License websites: www.laurelbridge.com	<p>Google Analytics</p> <ul style="list-style-type: none"> <li>• _ga</li> <li>• _gali</li> <li>• _gat</li> <li>• _gid</li> </ul>	<p>We use <a href="#">Google Analytics</a> cookies to collect anonymized IP information to permit us to analyze traffic patterns and page usage to improve this website. This data does not include personally identifiable information. You can view the Google Privacy Policy here: <a href="http://www.google.com/policies/privacy/">www.google.com/policies/privacy/</a>.</p>
Functionality or performance cookies		<b>We do not use functionality or performance cookies at this time.</b>
	Social media: LinkedIn or Twitter	We may support your use of third-party cookies to permit you to share content by sending a page from our website to your social media account. Such cookies may be used for remarketing purposes by LinkedIn or Twitter.
	Media: YouTube	We may support your use of cookies from YouTube in the framework of embedding videos in our website.
Targeting or advertising cookies		<b>We do not use targeting or advertising cookies at this time.</b>