

Privacy Statement

Effective date: **August 20, 2024**

At Veza, we take your privacy seriously. Please read this Privacy Statement to learn how we treat your personal data. A reference in this Privacy Statement to “Veza,” “we,” “us,” or “our” is a reference to Veza, or, if applicable, its relevant affiliate carrying out the processing of your Personal Information. By using or accessing our websites or other offerings which may include, but are not limited to, customer support, training, and other related products and services, (collectively, the “Services”) in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use, and share your information as described in this Privacy Statement.

Remember that your use of Veza’s Services is always subject to our SaaS End User Customer Agreement, which incorporates this Privacy Statement. Any terms we use in this Privacy Statement without defining them have the definitions given to them in the SaaS End User Customer Agreement.

Veza reserves the right to change or modify this Policy, including, without limitation, to reflect company and user feedback or changes in applicable law. Please revisit this Policy from time to time for changes and updates. Your continued use of the System constitutes your consent to any and all such changes.

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What this Privacy Statement Covers

This Privacy Statement covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules, or regulations. This Privacy Statement does not cover the practices of companies we do not own or control or people we do not manage.

If you apply for a job with us, please see our [Job Applicant Privacy](#) for specific information about how we use your Personal Data.

Personal Data

Types of Personal Data We Collect

<u>Type of Personal Data</u>	<u>Examples</u>	<u>Who we might share this information with:</u>
Profile or Contact Data	First name and last name Username Email Phone number Unique identifiers such as passwords	Service Providers Parties You Authorize
Device/IP Data	IP address Device ID Domain server Type of device/operating system/browser used to access the Services	Service Providers Parties You Authorize

If you use a location-enabled browser, we may receive information about your location

Advertising Partners

We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements, or communications.

Our Commercial or Business Purposes for Collecting or Disclosing Personal Data

- Providing, Customizing and Improving the Services
- Creating and managing your account or other user profiles.
- Providing you with the products, services, or information you request.
- Meeting or fulfilling the reason you provided the information to us.
- Providing support and assistance for the Services.
- Improving the Services, including testing, research, internal analytics, and product development.
- Doing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (the “CCPA”).
- Corresponding with You
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Veza or the Services.
 - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- Meeting Legal Requirements and Enforcing Legal Terms
 - Fulfilling our legal obligations under applicable law, regulation, court order or other legal processes, such as preventing, detecting, and investigating security incidents and potentially illegal or prohibited activities.
 - Protecting the rights, property, or safety of you, Veza or another party.
 - Enforcing any agreements with you.
 - Responding to claims that any posting or other content violates third-party rights.
 - Resolving disputes.

We will not collect additional types of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

How We Disclose Your Personal Data

We disclose your Personal Data to the types of service providers and other parties listed in this section. For more information, please refer to the state-specific sections below.

Service Providers. These parties help us provide the Services or perform business functions on our behalf. They include:

- Hosting, technology, and communication providers.
- Security and fraud prevention consultants.

Advertising Partners. These parties help us market our services and provide you with other offers that may be of interest to you. They include:

- Ad networks.
- Marketing providers.

Analytics Partners. These parties provide analytics on web traffic or usage of the Services. They include:

- Companies that track how users found or were referred to the Services.
- Companies that track how users interact with the Services.

Business Partners. These parties partner with us in offering various services. They include:

- Businesses that you have a relationship with.
- Companies that we partner with to offer joint promotional offers or opportunities.

Parties You Authorize, Access, or Authenticate

- Third parties you access through the services.
- Other users.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial Business Purposes for Collecting or Disclosing Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user or visitor. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you. Once aggregated, de-identified, or anonymized, we will not attempt to re-identify this information back to you. Please note that such information is not Personal Data and will not be subject to the same restrictions set forth in this Privacy Statement.

Tracking Tools, Advertising and Opt-Out

We use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files — placed on your computer, tablet, phone, or similar device when you use that device to access our Services. We may also supplement the

information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s).

We use the following types of Cookies:

Strictly Necessary Cookies. Strictly Necessary Cookies are required to provide you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Strictly Necessary Cookies are required for certain features and services, so they cannot be disabled.

Functional Cookies (or Personalization Cookies). Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region). Examples of functionality cookies include cookies that facilitate web chat services, user preferences, and the ability to comment on a blog.

Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns to help us improve our campaigns and the Services' content for those who engage with our advertising. For example, Google LLC ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/>.

Data Security

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational, and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

Data Retention

We retain Personal Data about you for as long as necessary to provide you with our Services or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for specific types of data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. In some cases, we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule, or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Personal Data of Children

We do not knowingly collect or solicit Personal Data about children under 13 years of age; if you are a child under the age of 13, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 13 years of age, we will delete that information as quickly as possible. If you believe that a child under 13 years of age may have provided Personal Data to us, please contact us at privacy@veza.com.

Your Rights under U.S. State Privacy Laws

Various U.S. States have implemented data privacy laws. The requirements imposed upon data processors vary by State. In general, if you have legitimate questions or concerns about how your personal data is being stored or processed by Veza, you or your Authorized Agent (defined below) may submit a request by email to privacy@veza.com

The request must (1) provide sufficient information to allow us to verify that you are the person about whom we have collected Personal Data (such as your name and email address), and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within the period required by applicable law. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive, or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request by submitting a request through email to privacy@veza.com.

If you are a California, Colorado, or Connecticut resident, you may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

California and Delaware "Do Not Track" Disclosures

California and Delaware law require Veza to indicate whether it honors "Do Not Track" settings in your browser concerning targeted advertising. Veza adheres to the standards set forth in this Policy and does not monitor or respond to Do Not Track browser requests.

California Resident Rights

If you are a California resident, you have the rights set forth in this section. Please see the "Exercising Your Rights" section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers' employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Statement and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@veza.com.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The types of Personal Data that we have collected about you.
- The types of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.

- The types of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the types of Personal Data shared with each type of third party recipient.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested, or if deletion of your Personal Data involves disproportionate effort. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Correction

You have the right to request that we correct any inaccurate Personal Data we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, if we decide, based on the totality of circumstances related to your Personal Data, that such data is correct. If your correction request is subject to one of these exceptions, we may deny your request.

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

Colorado Resident Rights

If you are a Colorado resident, you have the rights set forth under the Colorado Privacy Act (“CPA”). Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If there are any conflicts between this section and any other provision of this Privacy Statement and you are a Colorado resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@veza.com.

Access

You have the right to request confirmation of whether we are processing your Personal Data and to access your Personal Data.

Correction

You have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

Deletion

You have the right to delete your Personal Data.

Portability

You have the right to request a copy of your Personal Data in a machine-readable format, to the extent technically feasible, twice within a calendar year.

Appealing a Denial

If we refuse to act on a request within a reasonable period of time after receiving your request in accordance with this section, you may appeal our decision. In such an appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the original request pertains and to identify the original request, and (2) provide a description of the basis of your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under the CPA. We will respond to your appeal within 45 days of receiving your request. If we deny your appeal, you have the right to contact the Colorado Attorney General.

You may appeal a decision by submitting a request by email to privacy@veza.com.

Connecticut Resident Rights

If you are a Connecticut resident, you have the rights set forth under the Connecticut Data Privacy Act (“CTDPA”). Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If there are any conflicts between this section and any other provision of this Privacy Statement and you are a Connecticut resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@veza.com.

Access

You have the right to request confirmation of whether we are processing your Personal Data and to access your Personal Data.

Correction

You have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

Deletion

You have the right to delete your Personal Data.

Portability

You have the right to request a copy of your Personal Data that is processed automatically in a machine readable format, to the extent technically feasible.

Appealing a Denial

If we refuse to act on a request within a reasonable period of time after receiving your request in accordance with this section, you may appeal our decision. In such an appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the original request pertains and to identify the original request, and (2) provide a description of the basis of your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under the CTDPA. We will respond to your appeal within 60 days of receiving your request. If we deny your appeal, you have the right to contact the Connecticut Attorney General.

You may appeal a decision by submitting a request by email to privacy@veza.com.

Virginia Resident Rights

If you are a Virginia resident, you have the rights set forth under the Virginia Consumer Data Protection Act (“VCDPA”). Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If there are any conflicts between this section and any other provision of this Privacy Statement and you are a Virginia resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@veza.com.

Access

You have the right to request confirmation of whether we are processing your Personal Data and to access your Personal Data.

Correction

You have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

Portability

You have the right to request a copy of your Personal Data in a machine-readable format, to the extent technically feasible.

Deletion

You have the right to delete your Personal Data.

Opt Out of Certain Processing Activities

- You have the right to opt out of the processing of your Personal Data for targeted advertising purposes. To opt-out of our processing of Personal Data for targeted advertising purposes, please see "[Personal Data Sharing Opt-Out and Opt-in](#)" under the "California Resident Rights" section.
- You have the right to opt out of the sale of your Personal Data. We do not currently sell your Personal Data as defined under the VCDPA.

Appealing a Denial

If we refuse to act on a request within a reasonable period of time after receiving your request in accordance with this section, you may make an appeal. In such an appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the original request pertains and to identify the original request, and (2) provide a description of the basis of your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under the VCDPA. We will respond to your appeal within 60 days of receiving your request. If we deny your appeal, you have the right to contact the Virginia Attorney General using the methods described at <https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint>.

You may appeal a decision by submitting a request by email to privacy@veza.com.

European Union, United Kingdom, and Swiss Data Subject Rights

EU, UK and Swiss Residents

If you are a resident of the European Union ("EU"), United Kingdom ("UK"), Switzerland, Lichtenstein, Norway, or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (the "GDPR") with respect to your Personal Data, as outlined below.

For this section, we use the terms "Personal Data" and "processing" as they are defined in the GDPR, but "Personal Data" generally means information that can be used to individually identify a person, and "processing" generally covers actions that can be performed in connection with data such as collection, use, storage, and disclosure. Veza will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this section and any other provision of this Privacy Statement, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at privacy@veza.com. Note that we may also process Personal Data of our customers' end users or employees in connection with our provision of certain services to customers, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

Personal Data We Collect

The “Types of Personal Data We Collect” section above details the Personal Data that we collect from you.

Personal Data Use and Processing Grounds

The “Our Commercial or Business Purposes for Collecting Personal Data” section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

Contractual Necessity: We process the following types of Personal Data as a matter of “contractual necessity”, meaning that we need to process the data to perform under our Terms of Use with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.

- Profile or Contact Data

Legitimate Interest: We process the following types of Personal Data when we believe it furthers the legitimate interest of us or third parties:

- Profile or Contact Data
- Device/IP Data
- Web Analytics
- Professional or Employment-Related Data
- Geolocation Data
- Photos, Videos and Recordings
- Other Identifying Information that You Voluntarily Choose to Provide
- We may also de-identify or anonymize Personal Data to further our legitimate interests.

Examples of these legitimate interests include (as described in more detail above):

- Providing, customizing, and improving the Services.
- Marketing the services.
- Corresponding with you.
- Meeting legal requirements and enforcing legal terms.
- Completing corporate transactions.

Consent: In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.

Other Processing Grounds: From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

Sharing Personal Data

The “How We Share Your Personal Data” section above details how we share your Personal Data with third parties.

EU, UK and Swiss Data Subject Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please submit a request by email to privacy@veza.com. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

Access: You can request more information about the Personal Data we hold about you and request a copy of such Personal Data. You can also access certain of your Personal Data by logging on to your account.

Rectification: If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by logging on to your account.

Erasure: You can request that we erase some or all your Personal Data from our systems.

Withdrawal of Consent: If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all our Services.

Portability: You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.

Objection: You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.

Restriction of Processing: You can ask us to restrict further processing of your Personal Data.

Right to File Complaint: You have the right to lodge a complaint about Veza's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en.

Transfers of Personal Data

The Services are hosted and operated in the United States ("U.S.") through Veza and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Veza in the U.S. and will be hosted on U.S. servers, and you authorize Veza to transfer, store and process your information to and in the U.S., and possibly other countries. In some circumstances, your Personal Data may be transferred to the U.S. pursuant to (i) a data processing agreement incorporating standard data protection clauses and/or (ii) the Data Privacy Framework, as described below.

In addition, we will provide you with the choice to opt-out from the sharing of your Personal Data with any third parties (other than our agents or those that act on our behalf or under our instruction), or before we use it for a purpose that is materially different from the purpose for which it was originally collected or subsequently authorized.

In addition to any other disclosures described in our Privacy Statement, in certain situations, we may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Participation in the Data Protection Framework

Veza complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Veza 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 and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Veza has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern.

Liability in cases of onward transfers

Veza remains responsible for the processing of personal information it receives under the DPF Principles and subsequently transfers to a third party acting as an agent on its behalf. Veza remains liable under the DPF Principles if its agent processes such personal information in a manner inconsistent with the DPF Principles, unless Veza can prove it is not responsible for the event giving rise to the damage.

To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Veza commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact Veza at: privacy@veza.com

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Veza commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) or the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA) or the Swiss Federal Data Protection and Information Commissioner (FDPIC), with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF.

If a EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, or the Swiss-U.S. DPF complaint cannot be resolved through the above channels, under certain conditions, a Data Subject may invoke binding arbitration for claims not resolved by other redress mechanisms, as described in Annex I to the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF Principles (<https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction>).

The Federal Trade Commission has jurisdiction over Veza's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

Governing Law/Claims

This Policy, the System, and any claim associated with, related to, or arising from the Policy and/or System are governed by the law of the State of California within the United States. Any claim associated with, relating to or arising from this Policy or the System shall be brought in a federal or state court in the County of Santa Clara, State of California within one year after the claim arises. You hereby affirm your consent to the sole and exclusive jurisdiction of the courts located in the County of Santa Clara, State of California as the most convenient and appropriate forum for the resolution of disputes concerning this Policy or System. The System is controlled, operated and administered entirely within the United States. Use of the System from locations outside the United States where these practices are illegal or violate any law is prohibited.

System Provided "As Is" and Other Disclaimers

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Contact Information

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