

ARIN Corporation Privacy Notice

This Privacy Notice is effective as of June 1, 2018.

At ARIN Corporation (“ARIN”), we recognize the importance of protecting your personal information and are committed to processing it responsibly and in compliance with applicable data protection laws in all countries in which we operate.

In the normal course of its business activities, ARIN collects, uses, and sometimes shares personal information of various individuals and organizations in order to run its day-to-day operations. This Privacy Notice describes ARIN’s general privacy practices that apply to such personal information collection and use.

ARIN has certified certain of our services, for which we act as a data processor, under the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (the certification can be found here <https://www.privacyshield.gov/list>).

TYPES OF PERSONAL INFORMATION WE COLLECT

In describing our collection, use, and sharing of information in this Notice, we refer to our collection and use of "Personal Information." "Personal Information," as used in this Notice, is any information related to an identified or identifiable natural person. Examples of Personal Information include first and last name, mailing address, email address, other online contact information, or telephone number.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect Personal Information in two ways:

1. We collect information you provide to us in optional, voluntary submissions, such as in registration forms, user profiles, promotional signups, requests for customer service and mobile applications downloads.
2. We may collect some Personal Information automatically. This is described below in "Passive Data Collection."

Passive Data Collection

Analytics Tools

We use analytics tools and other third-party technologies, such as Google Analytics and Facebook Analytics to collect non-personal information in the form of various usage and user metrics when you use the ARIN website or use our services (the ARIN website and our services are referred to as “Sites and/or Services” in this Notice). These tools and technologies collect and analyze certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behavior and usage information, feature use metrics and statistics, usage and purchase history, MAC Address, mobile unique device ID, and other similar information.

The third-party analytics companies who collect information on our Sites and/or Services and other online products and/or services may combine the information collected with other information they have independently collected from other websites and/or other online or mobile products and services

relating to your activities across their network of websites as well as online and/or mobile products and services. Many of these companies collect and use information under their own privacy policies.

Google has additional information available about their Remarketing Privacy Guidelines, and Restrictions.

You may view a list of other third party service providers who collect information, and/or opt-out of such collection of information about you, by visiting <http://www.networkadvertising.org/choices/> or <http://www.aboutads.info/choices/>.

Cookies

We may use a variety of methods, including "cookies" to collect information.

What is a cookie?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user's device. You can find more information about cookies at: <http://www.allaboutcookies.org>.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that advertisements you see online are more relevant to you and your interests.

The cookies used on our Sites and/or Services have been categorized based on the categories found in the ICC UK Cookie guide. The cookies used on our Sites and/or Services by category are described below.

Performance Cookies

ARIN collects cookies on our Sites and/or Services to capture information about page visits (e.g. "performance cookies.") This information is anonymous, and ARIN uses this information only internally to deliver the most effective content to our visitors. Information from the cookie is used to gauge page popularity, analyze traffic patterns on our Sites and/or Services and guide development of other improvements to our Sites and/or Services.

Targeting, Performance, and Functionality Cookies

In our email programs, ARIN employs some tracking methods (e.g. "targeting, performance, and functionality cookies"). We track "opens" via a tracking pixel in the email- meaning we track who opens our e-mail messages and when you open our e-mail messages; and we track "clicks" via encoded URLs-meaning we track whether you click on the links contained in our e-mail messages. This information is used internally only to help us deliver relevant messaging and is not shared with any third parties.

Functionality and Necessary Cookies

ARIN does not require that you accept cookies and you may withdraw your consent to our use of cookies at any time by adjusting your browser's privacy settings, however, some functionality on our

Sites (e.g. “functionality cookies”), our product or service check-out process, and Services may be disabled if you decline to accept cookies (e.g. “necessary cookies”).

Opting Out of Cookies

By using the Sites and Services, you consent to the placement of the cookies referenced above. You can, however, set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. You may also change your cookie settings through preference options in our Sites and/or Services, where applicable. We will indicate that upon selecting your preferences, that we will use a cookie to remember your preferences.

HOW WE USE YOUR PERSONAL INFORMATION

We only use your data as expressly set forth in this Notice. If a need arises to use your data for a secondary purpose, we will provide you prior notice of such use.

Communication and Responding to Requests

We use your information, including Personal Information to provide you with customer support, process transactions, respond to users' requests, send newsletters and updates, send special offers and advertisements, seek your opinions and feedback, and connect users to ARIN Sites and/or Services, and to products and services of our partners and licensees.

Optimization

We use your information, including Personal Information, behavioral metrics, and other non-personally identifiable information to operate, provide, improve, and maintain our Sites and Services, to develop new products and services, to prevent abuse and fraud, to personalize and display advertisements and other content for you, and for other administrative and internal business purposes.

Advertising

We use your information, including Personal Information, behavioral metrics, geo-location data, demographic data and marketing preferences to personalize and display advertisements and other content for you.

Sharing Features

We use your information, including Personal Information and any other information you submit directly or through passive means to provide you with various ways to connect and share content (e.g., web content, user generated videos, text, drawings, and screen and lecture captures, and quizzing features, media, tools, services and other products) with third parties. For example, we may provide you with the opportunity to email a link to certain content to another person. To use this feature, we may require you to provide certain Personal Information including your email address and the email address of each person to whom you send the link.

We also may allow you to share links to content with users of various third-party services (e.g., social networking, search and sharing services). When sharing links using one of these third-party services, if you are not already logged in to the third-party service, you will need to supply login credentials for it. If you are not a registered user of the third-party service, you will need to sign up for it. You are

supplying the registration information or login credentials for the third-party service directly to that third-party, and not to us. By using any of these third-party services to share links to content, you permit us to access, use and disclose any information relating to your account on each such third-party service (such as your user name and profile information) that is available to us through the third-party service, including through its application programming interface (API) pursuant to this Notice.

More specifically, our Sites and/or Services may use interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or share information from our Sites and/or Services through these services, you should review the privacy notice of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your site visit to your personally identifiable information resulting in the public display of the same.

Legal basis for processing personal information (EEA visitors only)

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the ["How to contact us"](#) heading below.

REASONS WE SHARE YOUR PERSONAL INFORMATION

We do not share your personal information with third parties except as noted herein. We may share your personal information as necessary to maintain business operations, such as with vendors working on our behalf (for example, delivery of services and digital advertising); as required by law or to respond to legal process; to maintain the security of our products; to protect ARIN's customers, rights, or property.

WHERE WE STORE AND PROCESS YOUR PERSONAL INFORMATION

Personal data collected by ARIN may be stored and processed in our database's home office, in the United States, and in any other locations where ARIN operates and/or has facilities. The storage location(s) are chosen in order to operate efficiently, to improve performance, and to create redundancies in order to protect the data in the event of an outage or other problem. We take steps to

ensure that the data we collect under this Notice is processed according to the provisions of this Notice and the requirements of applicable law wherever the data is located. We may transfer personal data from the European Union or European Economic Area (“EU”) to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. ARIN is liable under the Privacy Shield Principles if its agent processes personal information in a manner inconsistent with the Privacy Shield Principles, unless ARIN proves that it is not responsible for the event giving rise to the damage.

ARIN complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. ARIN has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy notice and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

- In compliance with the Privacy Shield Principles, ARIN commits to resolve complaints about your privacy and our collection or use of your personal information. EU and Swiss individuals with questions or concerns about the use of their Personal Data should contact us at:

info@arinursing.org

Or, you may reach us using the following information:

ARIN
2201 Cooperative Way
Suite 600
Herndon, VA 20171 USA

- If a Customer's question or concern cannot be satisfied through this process, ARIN commits to cooperate under the Privacy Shield Principles with an independent dispute resolution mechanism operated by the European Union Data Protection Authorities (EU DPA) or the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by the EU DPA or FDPIC, as applicable.

If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed by ARIN, EU individuals may bring a complaint before the EU DPA (http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm) or Swiss individuals may bring a complaint before the FDPIC (<http://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/task.html>) .

Finally, as a last resort and in limited situations, EU and Swiss individuals may seek redress from the Privacy Shield Panel, a binding arbitration mechanism.

The Federal Trade Commission has jurisdiction over ARIN's compliance with the Privacy Shield Principles.

HOW WE SECURE YOUR PERSONAL INFORMATION

ARIN uses a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the internet, we

cannot guarantee that data, during transmission through the internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

HOW TO ACCESS AND CONTROL YOUR PERSONAL INFORMATION

You may access and review the Personal Information ARIN stores about you and correct any factual errors. Most of your Personal Information may be accessed and corrected by simply logging into your account and accessing your profile.

If you are an EU resident, you have the following data protection rights:

- You may access, correct, update or request deletion of your personal information.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails we send you.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)

You can exercise your rights by contacting us using the information provided in the [“How to contact us”](#) section heading below.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

NOTICE REGARDING AUTOMATED DECISION-MAKING AND PROFILING

In some instances, our use of your personal information may result in automated decisions being taken (including profiling).

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review. For example, we use automated decisions to provide targeted advertising on our Services that may be of interest to you. You can opt-out of targeted advertising by contacting us using the information provided in the [“How to contact us”](#) section heading below.

NOTICE REGARDING THIRD PARTY PRIVACY PRACTICES & SOCIAL MEDIA

This Privacy Notice applies solely to our Site and/or Services. Our site includes links to other, unaffiliated websites. If you access those sites and submit personal information, you are subject to the privacy notices applicable to those sites. We encourage you to carefully read the privacy notice of any website you visit.

Some of ARIN’s products and services (e.g. ARIN’s Snagit® for Windows and Mac, Camtasia® for Windows and Mac (and earlier versions of the same), the ARIN Relay® Self-Hosted applications, to name a few) interface or integrate with third party storing, sharing, and access sites and services such as Microsoft’s OneDrive site and services, and others. If you choose to store, share, or access files, content or information which may include personally identifiable information (collectively “content”) you create using ARIN’s products and services through these services, you should review the privacy policy of that service. For example, if you desire to store, share or access your content created with ARIN’s Snagit® application through the Snagit® Microsoft’s OneDrive® site and services integrated feature, you should review ARIN’s Privacy Notice, and you should also review Microsoft’s Privacy Statement sections titled OneDrive and Where Information is Stored and Processed as your content will be collected, processed and/or stored by ARIN and/or the third party provider, in this case Microsoft, in the United States and/or other countries. By directly using ARIN product’s integration with the Microsoft’s OneDrive site and services, you expressly consent to your content being shared with both ARIN and Microsoft.

HOW TO CONTACT US

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info@arinursing.org

Or, you may reach us using the following information:

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2201 Cooperative Way
Suite 600
Herndon, VA 20171 USA