



# Privacy Policy

Last update: 15 June 2021

TRM Labs, Inc. and its Affiliates (as defined herein) (collectively “TRM Labs” or “we”) know that you (“you”) care about how information about you is used and shared, and we take your privacy seriously. “Affiliates” means any entity that directly or indirectly controls, is controlled by, or is under common control with another entity, where “control” means possessing, directly or indirectly, the power to direct or cause the direction of the management, policies and operations of such entity, whether through ownership of voting securities, by contract or otherwise. Please read this Privacy Policy (“Privacy Policy”) to learn how we collect, use, disclose, store, and otherwise process personal information through [www.trmlabs.com](http://www.trmlabs.com) and its related websites and social media pages (“Sites”) and TRM Labs’ products and services, including our SaaS-based offerings (“Solutions”). Collectively, our Sites and Solutions are our “Services.”

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This Privacy Policy applies when you interact with us through our Services. It also applies anywhere it is linked. It does not apply to non-TRM Labs' websites, mobile applications, or services that may link to our Services or be linked to from our Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

We may make changes to this Privacy Policy from time to time. The date at the bottom of this page indicates when this Privacy Policy was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your information described in this Privacy Policy.

## 1. Information We Collect

### 1.1. Information you give us

We collect the following types of information from you.

- Contact and demographic information (e.g., names, phone number, company name, job title, email address, address, city, country, or other profile information).
- Login credentials, such as username and password.
- Billing information.
- Any content you submit in our online forums and chatrooms or by commenting on content posted on our Services. Please note that these comments are also visible to other users of our Services.
- Any content you submit as a testimonial or endorsement. (We request your consent before publishing testimonials or endorsements.)
- Information you provide when you complete a survey.
- Information you provide during a support call, which may include IP Addresses, post name, MAC Address, which are included in the support bundle.
- Information you provide when you request access to white-papers or download a tool.
- Information you provide when you participate in a contest, sweepstakes, or promotional offer.
- Information you submit to inquire about or apply for a job with us.
- If you contact us, we may keep a record of that correspondence and any contact information provided.
- Any other information you voluntarily submit to us, including information about other people. To the extent you provide us with information about other people, you must obtain their consent to do so.

## 1.2. Information We Collect From Other Sources

We collect the following types of information from third-party sources.

- Contact information, demographic information, and information about your interests.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your credit history and score from credit reporting agencies.
- Information about your interaction with advertisements that we place on third party websites from online analytics and advertising companies.

## 1.3. Information We Collect Automatically

When you interact with the Services, we collect the following information about you automatically.

- Analytics about your interaction with our Services, including traffic data, location data, weblogs and other communication data, the resources that you access, and how you reached our Services.
- Details regarding the device you use to access our Services, including, but not limited to, your IP address, operating system, and browser type.
- Information about how you interact with our ads and newsletters, including whether you open or click links in any correspondence.

## 1.4. Information Collected from Web Technologies

We use cookies and other technologies to provide features on our Services. We also partner with other companies that use these technologies to collect information about your use of our Services. For more information about the cookies that we use and a list of our partners, please see our Cookie Policy.

## 1.5. Job Applicants

When you apply for a job with us, we collect certain information about you as outlined in this Policy. Information may be collected about you in multiple ways: you may provide it to us in connection with your application; we may make observations in the application process or collect information from public information sources; or you may authorize us to collect information from

other sources, such as a former employer or reference. In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

## 2. How We Use Your Information

We may use the information we collect about you for the following purposes.

- Provide our Services: To provide you with our products and services (including through authorized partners), including to take steps to enter into a contract for sale or for services, process payments, fulfill orders, ship product, send service communications, provide maintenance and support, professional services, and/or access to subscription services, and conduct general business operations such as accounting, recordkeeping, and audits.
- Analytics: To create data that allows us to improve and grow our business, including to measure the effectiveness of ads, understand how our Services are being used, understand our customer base and purchasing trends, understand the effectiveness of our marketing, market our products, and develop new products and services.
- Personalization and Ads:
  - To personalize the Services to your preferences.
  - To contact you with personalized marketing and advertising about our products and services.
  - To deliver personalized advertising to you online, which may be based on your preferences or interests across services and devices.
- Security and Legal Compliance:
  - To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
  - To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with legal requirements regarding our Services.
- Jobs: To manage your job application.
- Consent: According to your consent.

## 3. How We Secure the Information We Collect From or About You

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. For example, we use:

- Physical safeguards that include locked doors and file cabinets, controlled access to our facilities and secure destruction of media containing personal information.
- Technology safeguards that include monitoring of our systems and data centers, third party penetration testing, firewalls and multi-factor authentication.
- Organizational safeguards that include making efforts to ensure that only necessary people have access to personal information, and training to ensure our employees understand the importance and means by which they must protect personal information.

While we use these and other precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

## 4. How We Share Your Information

### 4.1. Advertising Partners

We partner with companies that assist us in advertising our Solutions online. See “Information Collected from Web Technologies.” These companies may use tracking technologies on our website to collect or receive information from our Sites and elsewhere on the internet and then use that information to target ads to you.

### 4.2. Service Providers

We engage vendors to perform functions on our behalf, and they may receive information about you. These vendors are obligated by contract to use information that we share or they collect on our behalf only for the purpose of providing specific functions. The business functions our vendors support include services that support the Solutions, customer service, billing and collection, auditing and accounting, professional services, analytics services, security, information

technology services, and marketing. Our service providers also support our systems status reporting, our backend operations, and our career portal.

### 4.3. Social Media Platforms

If you interact with us on social media platforms, the platform may collect information about you and your interaction with us. If you interact with social media “widgets” on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.

### 4.4. In Response to Legal Process

We share data when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests.

## 5. Additional Information about Our Data Collection and Sharing Practices

### 5.1. Retention Periods

We retain information for different periods of time depending on the nature of the information and our legal obligations. In general, we will retain your personal information to fulfill the purposes for which it was collected, as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets, and enforce our agreements. We may also retain cached or archived copies of your personal information for a reasonable period of time in accordance with applicable law.

### 5.2. Sharing of Aggregated or De-Identified Information

We may use and share at our discretion information that has been aggregated (information that has been compiled into summaries or statistics) or de-identified (information that has been stripped of all unique identifiers such that it cannot be linked to a particular individual).

### 5.3. Combination of Information

We may combine information from the Services together and with other information we obtain from our business records.

### 5.4. Change of Ownership or Corporate Organization

We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this Policy.

### 5.5. Cross-border Transfer of Data

If you use our Services outside of the United States, we may collect, process, and store your information in the United States and other countries. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law.

### 5.6. Our Practices Regarding Information Belonging to Children

The Services are intended for users age 18 and older. TRM Labs does not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 18, we will delete that information.

### 5.7. Sharing of Medical or Health Information

To the extent that we receive protected health information about you, that information is subject to electronic disclosure to the extent permitted by applicable law.

## 6. Your California Privacy Rights

### 6.1. California Shine the Light

We may share your personal information with our business partners their direct marketing purposes. You may opt-out of such sharing by contacting us using the contact information below.

## 6.2. California Consumer Privacy Act

The California Consumer Privacy Act (“CCPA”) provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of information about them, as well as rights to know/access, delete, and limit sharing of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights.

To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and your rights are described below.

### 6.2.1. Notice at Collection Regarding the Categories of Personal Information Collected

You have the right to receive notice of the categories of personal information we collect and the purposes for which we use personal information.

The following table summarizes the categories of personal information we collect with examples; the categories of sources of that information; and whether we disclose or sell that information to service providers or third parties, respectively. The categories we use to describe personal information are those enumerated in the CCPA, and additional information about the specific types of personal information we collect are described above in “Information We Collect.” We collect each type of personal information for the purposes described in the “Uses of Information” section above. More information about the entities to which we disclose or sell personal information is described in “How We Share Your Information” above.

Category of Personal Information	Categories of Sources	Categories of Entities to which We Disclose Personal Information	Categories of Entities to which We Sell Personal Information
Personal Identifiers <ul style="list-style-type: none"> <li>• Contact information (name, phone number, address)</li> </ul>	You	<ul style="list-style-type: none"> <li>• Corporate Affiliates</li> <li>• Service Providers</li> </ul>	N/A



<p>Commercial Information</p> <ul style="list-style-type: none"> <li>• Billing and payment records</li> <li>• Order history</li> </ul>	You	<ul style="list-style-type: none"> <li>• Corporate Affiliates</li> <li>• Service Providers</li> </ul>	N/A
<p>Internet or Other Electronic Network Activity Information</p> <ul style="list-style-type: none"> <li>• IP address</li> <li>• Device identifier (e.g., MAC)</li> <li>• Information provided in URL string (e.g., search keywords)</li> <li>• Cookie or tracking pixel information</li> <li>• Information about your interaction with our website, app, or email correspondence</li> </ul>	You	<ul style="list-style-type: none"> <li>• Corporate Affiliates</li> <li>• Service Providers</li> <li>• Advertising Partners</li> </ul>	N/A
<p>Geolocation (via IP address)</p>	You	<ul style="list-style-type: none"> <li>• Corporate Affiliates</li> <li>• Service Providers</li> <li>• Advertising Partners</li> </ul>	N/A
<p>Content You Provide</p> <ul style="list-style-type: none"> <li>• Content in correspondence</li> <li>• Content posted to forums</li> <li>• Content submitted to chat functions</li> <li>• Survey responses</li> </ul>	You	<ul style="list-style-type: none"> <li>• Corporate Affiliates</li> <li>• Service Providers</li> </ul>	N/A

We may also disclose information to other entities who are not listed here when required by law or to protect us or other persons, as described in “How We Share Your Information.”

### 6.2.2. Right to Opt Out of Sale of Personal Information to Third Parties.

You have the right to opt out of any sale of your personal information by us to third parties (but not service providers). To opt-out of our sales of personal information, please contact us using the contact information below.

### 6.2.3. Right to Know About Sources of Personal Information and Personal Information Disclosed or Sold.

During the preceding 12 months, the categories of personal information we collected, the categories of sources of that information, and the entities to which we have disclosed or sold that information are described above.

Entities to whom we disclose information for business purposes are service providers, which are companies that we engage to conduct activities on our behalf. Service providers are restricted from using personal information for any purpose that is not related to our engagement.

Entities to whom we “sell” information are third parties. Under the CCPA, a business “sells” personal information when it discloses it to a company for monetary or other benefit. A company may be considered a third party either because the purpose for its sharing of personal information is not for an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for other purposes.

### 6.2.4. Right to Know and Request Access to and Deletion of Personal Information.

You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You also have the right to request in certain circumstances that we delete personal information that we have collected directly from you. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

### 6.2.5. Notice Regarding Participation in Financial Incentives.

We may offer incentives to you to provide information to us or allow us to retain or share your information. For example, when you take advantage of our free training, product offers, or events, we will ask you to provide information about yourself including name, telephone, email address, country, company name, job title, and number of employees of your employer. We may use your information to contact you with information about our services that we believe will be

useful or beneficial to you, and we may disclose your information to our business partners so they can contact you for the same purpose.

We will provide you with more information about these incentives when you sign up, and participation is voluntary. If you change your mind, you may opt out at any time by using the options we make available to you (please see below) or by contacting us via this address: [privacy@trmlabs.com](mailto:privacy@trmlabs.com).

The value of the information you disclose to us is directly related to the profit we may realize if you purchase a product or service that we advertise to you in the marketing materials we send.

## 7. Information for Individuals Located in the European Economic Area (“EEA”), U.K., or Switzerland

We process “personal data,” as that term is defined in the EU General Data Protection Regulation, for the purposes described in “How We Use Your Information” above. For each purpose of processing, we may use one or more of the following legal bases: (1) consent; (2) performance of our agreement to provide Services; or (3) as necessary for our legitimate interests in providing the Services, so long as those interests do not override your fundamental rights and freedoms related to data privacy.

Information we collect may be transferred to, and stored and processed in, the United States or any other country in which we or our affiliates or subcontractors maintain facilities, as described above. To the extent we may transfer personal data out of the EEA or receive personal data from entities located in the EEA, we use the European Commission’s standard contractual clauses as the lawful basis for such transfers.

If you are in the EEA, U.K., or Switzerland, you have certain rights. You may:

- Lodge a complaint about our data collection and processing actions with your data protection authority. Contact details for data protection authorities are available [here](#).
- Request from us access to information held about you or request transmission of your data to a third party.
- Request that we rectify inaccurate or incomplete information we hold about you.
- Request that we erase data when such data is no longer necessary for the purpose for which it was collected, when you withdraw consent and no other legal basis for processing exists, or

when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.

- Request that we restrict our processing if there is a dispute about the accuracy of the data, if the processing is unlawful, if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims, or if your request to object to processing is pending evaluation.
- Object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.
- Withdraw your consent at any time, if we are processing your personal data based on your consent.

## 8. INTENTIONALLY LEFT BLANK

## 9. Special Information for Nevada Residents

Residents of the State of Nevada have the right to opt out of the sale of certain types of information to other companies who will sell or license that information to others. TRM Labs does not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please use the contact information below.

## 10. Your Options to Control Your Information and Exercise Your Rights

You can manage the information we collect about you in the following ways. Please see our California and European Economic Area (GDPR) disclosures for information about your rights under their laws.

## 10.1. Note about our role as a data “processor” to our corporate clients

When TRM Labs provides its Solutions to its corporate clients, it may collect information that is considered personal information under applicable law. If you seek to exercise the rights you may have under various privacy laws with us, we may direct you to our client instead because we may have a legal and contractual obligation to do so.

## 10.2. Your Account

If you are a corporate customer of TRM Labs, please visit your account portal to update your contact information, and other preferences.

## 10.3. Email Unsubscribe

If at any time you would like to unsubscribe from receiving future emails, you can click the unsubscribe link at the bottom of any email you receive from us or email us at [privacy@trmlabs.com](mailto:privacy@trmlabs.com). Please be aware that your choice to unsubscribe will not affect our transactional communications with you.

## 10.4. Ad Choices and Cookies

### 10.4.1. On Our Sites

If you wish to disable cookies on our Sites, please see our cookie banner tool and options at [www.trmlabs.com](http://www.trmlabs.com). You may also use your browser’s settings to block or limit cookies on our Sites. If you delete your cookies or if you set your browser to limit or block cookies, some features of the Services may not be available, work, or work as designed. If you delete your cookies, you may also delete your opt-out preferences.

### 10.4.2. Across the Internet

If you wish to limit third-parties’ ability to collect information about you on our Sites and across the internet, you can learn more about the options available to you by visiting the websites for

the [TrustArc Preferences Manager](#), [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), or the [European Interactive Digital Advertising Initiative](#). You may also visit the privacy policy and opt-out links we provide in the “Information Collected from Web Technologies” section.

On mobile devices, you need to use your device’s settings to limit tracking. General information about privacy on Apple/iOS devices is [here](#), and information about Android settings is [here](#).

Please note that you will continue to receive non-personalized advertising even if you use these options and settings.

## 10.5. Do Not Track

Your browser or device may include “Do Not Track” functionality. We do not honor Do Not Track signals at this time.

## 10.6. How to Submit a Request to Exercise Your Rights

You may submit a request to exercise any of your rights using the contact information below. We may have a reason under the law why we do not have to comply with your request or may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

California residents may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means.

In order to process your request, we must verify your identity to protect your and others’ information.

- If you have an account with us, we will use your account credentials to authenticate you. This will result in faster processing of your request.
- If you do not have an account with us, we verify your identity by asking you to provide personal identifiers we can match against information we may have collected from you previously. We will also confirm your request using the email or telephone account stated in the request.

We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

## 11. Contact and Questions

If you have any privacy- or security-related questions, please contact us by sending an email to [privacy@trmlabs.com](mailto:privacy@trmlabs.com) or you can write to us at:

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Attention: Privacy  
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