

## Privacy@Optimizely

Optimizely is the world's leader in customer experience optimization, allowing businesses to dramatically drive up the value of their digital products, commerce and campaigns through its best in class experimentation software platform. To provide our services, we collect a limited amount of data about your customers (whom we refer to as "visitors") when they visit your website or use your digital products. This document answers frequently asked questions to help you assess the impact of using Optimizely on your organization's privacy program.



### WHAT DATA DOES OPTIMIZELY COLLECT?

Optimizely logs a limited amount of information about users of your website and digital products, which we call the "Visitor Data". This includes:

- Campaign and Experiment IDs: The identification number (ID) of the campaign or experiment that the visitor participated in.
- Variation ID: The ID of the variation that the visitor saw (for instance, if you have a website with a blue button and create a variation with a red button, each variation will have a variation ID).
- Referring URL: The URL of the web page that sent the visitor to your site.
- User Agent Data: The standard "userAgent header" passed by the browser, which contains information such as OS type and browser version.
- Event Data: A string indicating the type of event logged by Optimizely, such as whether a visitor has clicked on a button on your website. This data can optionally include customer-defined attributes and event tags.
- Timestamp: The data and time the event occurred.
- End User ID: The ID assigned to the visitor per project. For web experimentation and personalization, this corresponds to the <u>optimizelyEndUserId</u> cookie.
- End User IP: The visitor's IP address(es).

For more detailed information about the types of data we collect, please consult our <u>documentation</u> for the applicable product. You may also review our <u>Service-Specific Terms</u>.

As an open platform, we allow you to provide us with additional data about your visitors, for example, to identify repeat buyers. Please consult our documentation on <u>Dynamic Customer</u> <u>Profiles (DCP)</u>, <u>list attributes</u> and <u>integrations</u> for additional details on these features. To help minimize security and privacy risks, please note that our terms of service prohibit you from providing us with additional personal data or with sensitive personal information, such as health information.







Some of the Visitor Data that Optimizely collects can include IP addresses and end user IDs, which -- under certain circumstances -- might be considered "personal data" in the European Union. This data is collected from individual visitors who use websites and digital products where Optimizely projects are running.

This Visitor Data that Optimizely collects is very limited and only indirectly identifies a device. The end user ID for example is a randomly generated number, which by default is not tied by us to an email address or similar direct identifiers.

If you wish to do so, you may <u>anonymize IP addresses</u> of your visitors. We also allow you to set a custom expiration time for the Optimizely cookies through our <u>APIs</u>.

In addition, when your employees or other authorized users set up an account on Optimizely, we will collect basic account information from the individual, such as a person's username, name, work email address, work contact details, and job title.

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#### HOW DOES OPTIMIZELY USE THE PERSONAL DATA COLLECTED?

We only process personal data in accordance with your company's permission and instructions as set out in your agreement with us. We do not share any of the Visitor Data collected for you unless you instruct us to do so, and we do not allow other companies to test with or target your visitors using your Visitor Data. If a visitor to your site or app uses one of our other customers' sites or apps, they will receive a different end user ID.

## THE EU REQUIRES A LAWFUL BASIS FOR COLLECTING PERSONAL DATA. WHAT ARE OPTIMIZELY'S GROUNDS FOR COLLECTING PERSONAL DATA?

When operating within your websites and digital products, we collect data from your visitors as a "data processor" to enable you, the "data controller," to test and personalize your content and features. As the data controller you are responsible for providing appropriate privacy and cookie notices to your visitors, and for obtaining consent, if needed. You should also consider implementing an opt-out choice for visitors as described in our <u>documentation</u>. Optimizely, like other services, does not display a separate cookie pop-up or privacy policy to your end users. Instead, you may choose to integrate Optimizely with popular tag management and cookie banner tools.

#### DOES OPTIMIZELY MAINTAIN A RECORD OF WHEN PERSONAL DATA WAS COLLECTED? HOW LONG IS PERSONAL DATA STORED?

The Visitor Data we collect receives a timestamp to indicate when it was received by Optimizely. Starting on May 25, 2018, Visitor Data, such as raw Event Data for a specific visitor, will be kept for up to 1 year only. We retain other data, such as account information for authorized users, aggregated data and DCP data, for as long as your account is active with us. Should you terminate your agreement with Optimizely, you will be provided with an opportunity to download your Visitor Data available at the time. Upon your request, we offer to delete your Visitor Data in our production instances.

To reduce the amount of potential personal data stored with Optimizely, you can take advantage of our data minimization features: IP anonymization allows you to anonymize IP addresses after content is delivered and cookie expiration allows you to set the expiry time for Optimizely cookies through our APIs, as described in our documentation.

#### WHERE DOES OPTIMIZELY STORE PERSONAL DATA? DOES IT USE ANY THIRD-PARTY PROCESSORS?

Like most modern technology companies, Optimizely uses leading cloud providers and other service providers to deliver a robust service. We have listed each of the key <u>Optimizely processors</u> who process personal data (also known as "sub-processors") for our product.

Our services are currently hosted on servers based in the United States.

We have certified to the EU-U.S. and Swiss-U.S. Privacy Shield frameworks for customer-related data. This provides you with the option of relying on these frameworks for the transfer of data from the EU to the U.S. You can find more information on our Privacy Shield certifications in our <u>Privacy Policy</u>.

# HOW DOES OPTIMIZELY ALLOW US TO ACCESS AND DELETE OUR EU VISITORS' PERSONAL DATA?

We will assist you should you receive a request from an EU data subject for data access or deletion. Our support engineers will be trained to export and erase the event data records associated with identifiers you provide. For data stored in DCP and similar databases you manage, you will need to identify the particular records you would like to erase.

# WHAT TECHNICAL AND ORGANIZATIONAL MEASURES HAS OPTIMIZELY IMPLEMENTED TO HELP SECURE PERSONAL DATA STORED ON ITS SYSTEM?

We will assist you, through appropriate technical and organizational measures, should you receive Every day thousands of companies use Optimizely on their websites and in their digital products to deliver billions of experiences, so we have built our service with security in mind. For more information, please refer to our current <u>security measures</u>.

# DOES OPTIMIZELY HAVE A PROCESS FOR TESTING, ASSESSING AND EVALUATING THE EFFECTIVENESS OF ITS SECURITY MEASURES REGULARLY?

Our security program includes annual security reviews by security consultants, automated source code analysis to find common security issues, and a bug-bounty program to encourage disclosure of security issues. For more information, please refer to our current <u>security measures</u>.

We have also achieved ISO 270001 certification and have completed a Type 1 SOC 2 examination. For more information, please consult our <u>compliance measures</u>.

#### DOES OPTIMIZELY HAVE A NOTIFICATION PROCESS IN PLACE IN THE EVENT OF A DATA BREACH?

We will inform you promptly in the event we learn of any unauthorized access, disclosure, or destruction of your Visitor Data per the terms of your agreement with us.

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### DOES OPTIMIZELY HAVE A GDPR-READY DATA PROCESSING AGREEMENT?

Optimizely offers a GDPR-ready data processing agreement (DPA) to customers. Your Account Executive or Customer Success Manager can assist you with signing the DPA.

