



# UTOPIUS INSIGHTS

## Privacy Policy

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## OVERVIEW

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Utopus Insights, Inc. ("us", "we", or "our") operates the website at <https://www.utopusinsights.io> (the "Site"). This privacy policy ("**Policy**") explains what data we collect when you use the Site, why we collect the data, how it is used and your rights and choices.

By using the Site, you agree to the practices described in this Policy.

## INFORMATION COLLECTION AND USE

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While using our Site, we collect information that alone or in combination with other information could be used to identify you ("**Personal Data**"), as described below:

### LOG-IN INFORMATION

When you log-in to our Site, we ask you to provide us with your name and email address. This data is used in order to grant access to the Site and ensure the security of our network and systems.

Such use of your Personal Data is necessary for the performance of the contract between you and us and for our legitimate interest in keeping our Site, network and information systems secure, managing our internal business/technical operations and complying with applicable laws.

For information about what we mean by legitimate interests and the rights of individuals in the European Union ("EU"), please see the "EU Users" section below.

### LOG DATA

Like many site operators, our servers automatically record information that your browser sends whenever you visit our Site ("**Log Data**"). This Log Data typically includes information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics, and one or more cookies that may uniquely identify your browser (for information about the cookies used on the Site, please read the "Use of Cookies" section below).

We use Log Data for internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep our Site, network and information systems secure. In addition, we may use Log Data for Customer Success Management ("CSM") to improve your future use of the Site (including to increase our Site's functionality, product features, and user-friendliness). Processing Log Data for the aforementioned purposes is necessary for our legitimate interests in pursuing those purposes.

For information about what we mean by legitimate interests and the rights of individuals in the EU, please see the "EU Users" section below.

## COMMUNICATIONS

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We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that relates to the software and services you have licensed.

## USE OF COOKIES

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In operating the Site, we use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Site gives to your browser when you access the Site. Our cookies help provide additional functionality to the Site and help us analyze Site usage more accurately. For instance, our Site may set a cookie on your browser that allows you to access the Site without needing to remember and then enter a password more than once during a visit to the Site. In all cases in which we use cookies, we will not collect Personal Data except with your permission. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off, however if you do so, some parts of the Site will not then work.

The following table is a list of cookies that are used in Utopus Insights software:

Name	Provider	Purpose	Expiry	Classification	Additional Information
_ga	Google Analytics	Used to distinguish users.	2 years	First party	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_gid	Google Analytics	Used to distinguish users.	24 hours	First party	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_gat	Google Analytics	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named <code>_dc_gtm_&lt;property-id&gt;</code> .	1 minute	First party	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
_gac_<property-id>	Google Analytics	Contains campaign related information for the user. If you have linked your Google Analytics and Google Ads accounts, Google Ads website conversion tags will read this cookie unless you opt-out.	90 days	First party	<a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a>
__cfduid	highcharts.com	Used by the content network, Cloudflare, to identify trusted web traffic.	1 year	Strictly necessary – Third party	<a href="http://www.highcharts.com">www.highcharts.com</a>

__utma	Google Analytics	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.	2 years from set/update	First party	<a href="https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage</a>
__utmt	Google Analytics	Used to throttle request rate.	10 minutes	First party	<a href="https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage</a>
__utmb	Google Analytics	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.	30 mins from set/update	First party	<a href="https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage</a>
__utmc	Google Analytics	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.	End of browser session	First party	<a href="https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage</a>
__utmz	Google Analytics	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.	6 months from set/update	First party	<a href="https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage</a>
__utmv	Google Analytics	Used to store visitor-level custom variable data. This cookie is created when a developer uses the _setCustomVar method with a visitor level custom variable. This cookie was also used for the deprecated _setVar method. The cookie is updated every time data is sent to Google Analytics.	2 years from set/update	First party	<a href="https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage</a>
apps-service-app-scipher-vx-*	Utopus Insights	Identifies currently authenticated session.	Session	Strictly necessary	
AMP_TOKEN	Google Analytics	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.	30 seconds to 1 year	First party	<a href="https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/colletion/analyticsjs/cookie-usage</a>

AWSALB	Amazon AWS	Sticky session cookie for AWS Load Balancer to route requests to the same target in a target group.	30 min	First party	<a href="https://docs.aws.amazon.com/elasticloadbalancing/latest/application/load-balancer-target-groups.html#sticky-sessions">https://docs.aws.amazon.com/elasticloadbalancing/latest/application/load-balancer-target-groups.html#sticky-sessions</a>
AWSALBCORS	Amazon AWS	Sticky session cookie for AWS Load Balancer to route requests to the same target in a target group (Chromium-specific cookie).	30 min	First party	<a href="https://forums.aws.amazon.com/ann.jspa?annID=7413">https://forums.aws.amazon.com/ann.jspa?annID=7413</a>
hl	Utopus Insights	Host language (e.g., en).	1 year	Strictly necessary	
opus_auth	Utopus Insights	Authentication token for current session.	Session	Strictly necessary	
usersetting-session-id	Utopus Insights	Identifies user settings.	Session	Strictly necessary	
ui-app-scipher-vx-*	Utopus Insights	Identifies currently authenticated session.	Session	Strictly necessary	

## HOW WE SHARE DATA

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We may share your data as follows:

- With our service providers who assist us in meeting business operations needs and to perform certain services and functions, including providers of hosting, cloud services and other information technology service providers that assist us in the administration, maintenance and optimization of the Site;
- With any relevant third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets, including in the event of a reorganization, dissolution or liquidation; and
- Any relevant party, claimant, law enforcement agency, court, governmental, supervisory or regulatory bodies, to the extent necessary for the establishment, exercise or defense of legal rights in accordance with applicable laws and regulations.

## DATA RETENTION

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We will keep your Personal Data for as long as reasonably necessary for the purposes described in this Policy, while we have a legitimate business need to do so, or as required by law (e.g. for tax, legal, accounting or other purposes), whichever is the longer.

To determine the appropriate retention period for your personal data, we will consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we use your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## EU USERS

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**Scope.** This section applies if you are a user in the EU (for these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway and, to the extent applicable, Switzerland).

**Data Controller.** Utopus Insights, Inc. is the data controller responsible for your Personal Data collected through this Site. As a wholly owned affiliate of Vestas Wind Systems A/S (“**Vestas**”), Vestas is our representative in the European Union pursuant to Article 27 of the General Data Protection Regulation, only on matters related to the processing of Personal Data collected through the Site. You may contact us or our representative as set out under the “Contact Us” section below.

**Your Rights.** Subject to applicable EU law, you have the following rights in relation to your Personal Data:

- **Right of access:** If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data along with certain other details. If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your Personal Data is inaccurate or incomplete, you are entitled to ask that we correct or complete it.
- **Right to erasure:** You may ask us to delete or remove your Personal Data, such as where you withdraw your consent.
- **Right to restrict processing:** You may ask us to restrict or ‘block’ the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of the data or object to us processing it. We will tell you before we lift any restriction on processing.
- **Right to data portability:** You have the right to obtain your Personal Data in a structured, commonly used and machine-readable format where our legal basis for processing your data is your consent or necessity to perform a contract with you, if applicable.
- **Right to object:** You may ask us at any time to stop processing your Personal Data, and we will do so, if we are relying on the legitimate interest legal basis to process your Personal Data - unless we demonstrate compelling legitimate grounds for the processing;
- **Right to withdraw consent:** If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing of your data before we received notice that you wished to withdraw your consent; and
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

You may exercise your rights by contacting us as indicated under the “Contact Us” section below.

**Legitimate Interest.** “Legitimate interests” means our interests in administering and conducting our business, managing risks and delivering the best Site experience to you. This Policy describes when we process your Personal Data for our legitimate interests, what these interests are and your rights. We will not use your Personal Data for activities where the impact on you overrides our interests, unless we have your consent or those activities are otherwise required or permitted by law.

## INTERNATIONAL DATA TRANSFERS

We are based in the United States and the information collected through the Site will be stored on servers located in the United States as necessary to enable you to access, navigate and use our Site, and the data may be transmitted to our service providers supporting our business operations (described above). The laws of the United States may not afford your information that same privacy rights as the country or jurisdiction in which you are located. We will take steps to ensure that your information receives an adequate level of security protection where it is processed and your rights continue to be protected. For more information, please contact us as described below.

## SECURITY

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The security of your Personal Data is important to us, but ask that you please remember that no method of transmission over the Internet nor method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data including secure servers, next generation firewalls and 3<sup>rd</sup> party cybersecurity audits, we cannot guarantee its absolute security.

## CHANGES TO THIS PRIVACY POLICY

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This Privacy Policy is effective as of January 15, 2019 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Site after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

## CONTACT US

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If you have any questions about this Privacy Policy or the information practices of the Site, please contact us at [support@utopusinsights.com](mailto:support@utopusinsights.com).

If you are an individual in the EU, you can also contact Vestas, who has been appointed as Utopus Insights, Inc.'s representative in the EU pursuant to Article 27 of the General Data Protection Regulation, only on matters related to the processing of Personal Data activities that take place in the EU. To make such an inquiry, please contact us at [support@utopusinsights.com](mailto:support@utopusinsights.com).