

Welcome to Netlok! We are committed to protecting your privacy and helping you understand your rights. This policy explains how we collect, use, share, and protect your personal information. If you have questions, email us at [photoloksupport@netlok.com](mailto:photoloksupport@netlok.com).

## Executive Summary

What We Register	Why We Register It	Your Key Rights
Name, email, phone, images	To provide and secure services	Access, correct, delete, limit use, portability
Device & usage info	Improve and protect services	Opt-out of marketing, non-discrimination
Payment info (via processor)	Process transactions	California: Additional CCPA rights

## 1. Scope

This policy applies when you:

- Visit [netlok.com](https://netlok.com)
- Use Photolok® (our image-based authentication software)
- Interact with us (sales, marketing, support, events)

## 2. Key Definitions

- **Personal Information:** Data that identifies or relates to you or your household
- **Photolok:** Our image-based authentication software
- **Services:** Our website, Photolok, and related offerings
- **Data Controller:** Netlok, LLC (we determine how and why personal information is processed)
- **Register:** We do not collect personal information. We register information that you provide which is necessary to use Photolok. If you cancel your subscription, opt-out and/or request that your account be deleted, we delete your information from our data base to meet current regulations.

## 3. Information We Register

### Information You Provide

Account Information:

- Name, email address, mobile number
- Account security information and credentials
- Profile information and preferences

Payment Information:

- Credit/debit card details (processed securely by third-party processors)
- Billing address and transaction history
- We do not store payment card numbers

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### 3. Information We Register (cont.)

#### Information You Provide

Communication & Support:

- Messages, emails, and chat communications
- Survey responses and feedback
- Support ticket information

Images:

- Images you chose from Photolok's image library for authentication

#### Information Registered Automatically

Device & Technical Information:

- IP address, browser type, device identifiers
- Operating system, device model, mobile carrier
- Screen resolution and device capabilities

Usage & Activity Data:

- Pages visited, features used, time spent
- Click patterns, navigation paths
- Search queries and interactions

Location Information:

- General geographic location (city/region level)
- Time zone information
- We do not collect precise GPS coordinates

Tracking Technologies:

- Session preferences and settings
- Usage analytics and performance metrics
- Security and fraud prevention data

### 4. Detailed Data Categories (CCPA Compliance)

Category	Specific Data	Sources	Business Purpose
Identifiers	Name, email, phone, IP address, device ID	Direct from you, automatic collection	Account management, authentication
Commercial Information	Transaction history, payment methods	You, payment processors	Billing, fraud prevention
Internet Activity	Browsing history, search queries, clicks	Automatic collection	Service improvement, analytics
Geolocation	City, region, time zone	Automatic collection	Localization, security
Professional Information	Company (if provided)	Direct from you	Business services, support

## 5. How We Use Your Information

### Communication & Support:

- Messages, emails, and chat communications
- Survey responses and feedback
- Support ticket information

### Service Delivery

- Create and manage your account
- Provide customer support and technical assistance
- Process transactions and billing
- Authenticate your identity through Photolok
- Deliver and personalize our services

### Security & Fraud Prevention

- Detect and prevent fraudulent activity
- Monitor for security threats and vulnerabilities
- Enforce our terms of service
- Protect our rights, property, and safety

### Communication

- Send service notifications and updates
- Provide customer support responses
- Marketing communications (with your consent)
- Important policy or security announcements

### Business Operations

- Improve and optimize our services
- Conduct analytics and research
- Comply with legal obligations
- Develop new features and products

### Legal Basis for Processing

- Consent: Marketing communications
- Contract Performance: Service delivery, account management
- Legitimate Interests: Security, fraud prevention, service improvement
- Legal Compliance: Regulatory requirements, legal obligations

## 6. Information Sharing

### We Do Not Sell Personal Information

**We do not and will not sell your personal information to third parties.**

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## 6. Information Sharing

### When We Share Information

#### Service Providers (Data Processors):

- Payment processors (CardConnect)
- Cloud storage providers (AWS, Google Cloud, Microsoft Cloud)
- Analytics providers (e.g., Google Analytics, Fingerprint.com, Salesforce)
- Customer support platforms
- Bound by strict confidentiality agreements where appropriate

#### Legal Requirements:

- Court orders, subpoenas, or legal process
- Law enforcement requests with proper authorization
- Protection of rights, property, or safety
- Compliance with applicable laws and regulations

#### Business Transfers:

- Mergers, acquisitions, or asset sales
- Corporate restructuring or bankruptcy
- Privacy protections maintained in all transfers

#### Master Contract Accounts:

- Account administrators as specified in enterprise agreements
- Authorized personnel within customer organizations
- Limited to account management and billing information

#### Emergency Situations:

- Imminent threats to safety or security
- Prevention of fraud or illegal activity
- Protection of our systems and infrastructure

### Third-Party Service Providers

#### Key Partners:

- **Payment Processing:** CardConnect
- **Cloud Infrastructure:** Amazon Web Services, Google Cloud Platform, Microsoft Cloud
- **Analytics:** Google Analytics, Fingerprint.com, Salesforce Analytics
- **Support:** Salesforce, AT&T
- **Security:** Cloudflare, security monitoring services

For a complete list of current service providers, contact us at [photoloksupport@netlok.com](mailto:photoloksupport@netlok.com)

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## 7. Data Retention

Data Type	Retention Period	Deletion Method
Account Data	60 days after account closure	Secure deletion
Payment Data	Per processor requirements (typically, 7 years)	Processor deletion
Authentication Logs	12 months	Automated deletion
Marketing Data	Until opt-out or 3 years of inactivity	Secure deletion
Support Communications	3 years after resolution	Secure deletion

### Retention Criteria:

- Legal and regulatory requirements
- Business necessity and legitimate interests
- Contract performance obligations
- User consent and preferences

### Secure Deletion:

- Cryptographic erasure for encrypted data
- Multi-pass overwriting for unencrypted data
- Physical destruction of storage media when necessary
- Verification of complete data removal

## 8. Data Security

### Technical Safeguards

- Encryption: AES-256 encryption at rest, TLS 1.3 in transit
- Access Controls: Multi-factor authentication, role-based access
- Network Security: Firewalls, intrusion detection systems
- Monitoring: 24/7 security monitoring and incident response

### Organizational Safeguards

- Employee Training: Regular privacy and security training
- Background Checks: Security clearance for personnel with data access
- Incident Response: Comprehensive breach response procedures
- Audits: Regular security assessments and penetration testing

### Your Security Responsibilities

- Keep your Photolok images confidential and secure
- Report suspicious activity immediately
- Regularly review your account settings

**Important:** No system is 100% secure. While we implement industry-standard protections, you use our services at your own risk.

## 9. Data Breach Notification

### Our Commitment

- **Detection:** Continuous monitoring for potential breaches
- **Response:** Immediate containment and investigation
- **Notification:** Prompt communication to affected users
- **Recovery:** Comprehensive remediation and improvement

### Notification Timeline

- **Regulatory Authorities:** Within 72 hours of discovery
- **Affected Users:** Within 72 hours unless disclosure would compromise security
- **Public Disclosure:** As required by law or if widespread impact

### What We'll Tell You

- Nature and scope of the breach
- Types of information involved
- Steps we've taken to address the issue
- Actions you can take to protect yourself
- Contact information for questions

## 10. Your Privacy Rights

### All Users

#### Access Rights:

- Know what personal information we collect and use
- Understand how we share and protect your data
- Receive copies of your personal information

#### Correction Rights:

- Update or correct inaccurate information
- Add missing information to your profile
- Verify the accuracy of your data

#### Deletion Rights:

- Request deletion of your personal information
- Close your account and remove associated data
- Note: Some data may be retained for legal compliance

#### Portability Rights:

- Receive your registration data in a structured, machine-readable format
- Transfer your registration data to another service provider
- Export your account information except for Photolok proprietary images

#### Opt-Out Rights:

- Unsubscribe from marketing communications
- Disable non-essential cookies
- Limit data collection where possible

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## 10. Your Privacy Rights (cont.)

### California Residents (CCPA/CPRA)

#### Enhanced Rights:

- **Right to Know:** Detailed information about data practices
- **Right to Delete:** Request deletion with limited exceptions
- **Right to Correct:** Fix inaccurate personal information
- **Right to Opt-Out:** Prevent sale/sharing (we don't sell data)
- **Right to Limit:** Restrict use of sensitive personal information
- **Right to Non-Discrimination:** No penalties for exercising rights

#### Sensitive Personal Information:

- Precise geolocation not collected
- Account security information protected with enhanced controls

### Other State Rights

#### Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA):

- Similar rights to California residents
- Appeals process for denied requests
- Opt-out of targeted advertising and profiling

### How to Exercise Your Rights

**Email:** [photolokadmin@netlok.com](mailto:photolokadmin@netlok.com)

**Phone:** 805-717-9898

**Mail:** Netlok, LLC, 1171 Crestline Dr, Santa Barbara, CA 93105

#### Identity Verification

- We may request additional information to verify your identity
- Authorized agents must provide written authorization
- Response time: 45 days (extendable to 90 days for complex requests)

## 11. Automated Decision-Making

#### Account Security

- Automated fraud detection and prevention
- Suspicious activity monitoring
- Account lockout procedures for security

#### Your Rights

- Request human review of automated decisions
- Understand the logic behind automated processing
- Challenge decisions that affect you adversely
- Receive explanation of automated decision-making

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## 11. Automated Decision-Making (cont.)

### Appeal Process

1. Contact support with your concern
2. Provide relevant details and context
3. Human review within 5 business days
4. Written explanation of decision
5. Escalation to management if unresolved

## 12. International Data Transfers

### Cross-Border Processing

- Your data may be processed in the United States
- We use appropriate safeguards for international transfers
- Standard contractual clauses with international partners
- Adequacy decisions where applicable

### Transfer Safeguards

- Encryption: All data encrypted during transfer
- Contracts: Privacy clauses with all international partners
- Monitoring: Regular compliance assessments
- Rights: Your privacy rights remain protected globally

## 13. Children's Privacy

### Under 13 (COPPA Compliance)

- Services not intended for children under 13
- We do not knowingly register information from children under 13
- If we learn we have collected such information, we delete it immediately
- Parents can contact us to request deletion of their child's information

### California Minors (Under 18)

- Registered users under 18 can request removal of posted content
- Contact [photoloksupport@netlok.com](mailto:photoloksupport@netlok.com) for assistance
- We cannot guarantee complete removal from all systems
- Some content may be retained for legal compliance

### Parental Controls

- Parents can review and delete their child's information
- Account closure available upon parental request
- Educational resources available for online safety

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## 14. Changes to This Policy

### Update Process

- Material changes require 30 days advance notice
- Notice provided via email to registered users
- Prominent website notification for significant changes
- Master Contract account administrators notified separately

### Continued Use

- Continued use of services after changes indicates acceptance
- Right to close account if you disagree with changes

### Change Log

- **July 16, 2025:** Comprehensive update for enhanced compliance and transparency
- **Previous versions:** Available upon request

## 15. Contact Information

### General Inquiries

Email: [photoloksupport@netlok.com](mailto:photoloksupport@netlok.com)

Phone: 805-717-9898

Hours: Monday-Friday, 9 AM - 6 PM PST

### Privacy Requests

Email: [photolokadmin@netlok.com](mailto:photolokadmin@netlok.com)

Phone: 805-717-9898

### California Residents

Email: [photoloksupport@netlok.com](mailto:photoloksupport@netlok.com)

Phone: 805-717-9898

### Mailing Address

Netlok, LLC  
1171 Crestline Dr  
Santa Barbara, CA 93105, USA

## 16. Complaint Process

### Internal Resolution

1. Contact our privacy team with your concern
2. Detailed investigation within 30 days
3. Written response with resolution or explanation
4. Appeal process if unsatisfied with response

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## 16. Complaint Process (cont.)

### External Authorities

California Residents:

- California Attorney General: [oag.ca.gov/contact](https://oag.ca.gov/contact)
- California Privacy Protection Agency: [cppa.ca.gov](https://cppa.ca.gov)

Federal Complaints:

- Federal Trade Commission: [ftc.gov/complaint](https://ftc.gov/complaint)
- Consumer Financial Protection Bureau: [consumerfinance.gov/complaint](https://consumerfinance.gov/complaint)

International Users:

- Your local data protection authority
- EU residents: [edpb.europa.eu](https://edpb.europa.eu)

## 17. Glossary

**Cookies:** Small files stored on your device to remember preferences

**Data Controller:** The entity that determines how and why personal data is processed

**Data Processor:** The entity that processes personal data on behalf of the controller

**Encryption:** Technology that scrambles data to protect it from unauthorized access

**Personal Information:** Registered information that identifies or relates to an individual and their Photolok account.

**Pseudonymization:** Processing data so it can no longer be attributed to a specific person without additional information

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*Thank you for trusting Netlok with your privacy. We are committed to protecting your personal information and respecting your privacy rights. This policy reflects our dedication to transparency, security, and your control over your personal data.*

*Last updated: July 16, 2025*