WEBSCALE

Privacy Policy

Version 1.2 – Dated January 28, 2026

At Webscale, your privacy is important to us. This Privacy Policy explains how we collect, use, disclose, and protect your Personal Data when you access or use our Services. By using our Services, you agree to the practices described in this Privacy Policy.

Your use of the Services remains subject to our **Terms of Use** https://www.webscale.com/terms-of-use/. Any undefined terms follow the definitions in the Terms of Use.

You may print a copy of this Privacy Policy here

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other factors. When we make material changes, we will notify you through our website, email, or other appropriate methods. Your continued use of the Services after changes have been posted signifies your acceptance of the updated policy.

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1. What This Privacy Policy Covers

This Privacy Policy applies to Personal Data we collect when you access or use our Services. "Personal Data" means information that identifies, relates to, or can reasonably be linked to an individual.

This policy does **not** apply to:

- Third-party sites or services that we do not control.
- Information processed on behalf of our customers in our capacity as a service provider/processor.

2. Personal Data We Collect

We may collect the following categories of Personal Data (past 12 months included):

Category	Examples	Third Parties Shared With
Contact Data	Name, email, phone, address	Service providers, analytics partners
Payment Data	Card type, last 4 digits, billing details	Payment processor (Stripe)
Commercial Information	Purchase, subscription, or usage history	Service providers
Device/Technical Data	IP address, device ID, OS, browser, session logs	Hosting, analytics, anti-fraud tools
Web Analytics	Page views, click data, referring pages, behavioral logs	Analytics partners
Professional Data	Organization name, role (if provided)	Service providers
Geolocation Data	Approximate location from IP	Analytics and ad partners
User-Provided Content	Emails, support requests, survey responses	Service providers

We do **not** collect **sensitive Personal Data** unless explicitly required (e.g., authentication security logs) and only with user consent where applicable.

3. Categories of Sources of Personal Data

We collect Personal Data from:

You

- When you provide such information directly to us.
- When you use our interactive tools and Services.
- When you send us an email or otherwise contact us.
- When you use the Services and such information is collected automatically.

- Through Cookies (defined in the "Tracking Tools, Advertising and Opt-Out" section below).
- If you use a location-enabled browser, we may receive information about your location.

Automated Technologies

- Cookies, pixels, logs, analytics SDKs, browser signals.
- Geo-location (approximate) based on IP address.

Third Parties

- **Vendors**

- We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
- We may use vendors to obtain information to generate leads and create user profiles.

- **Advertising Partners**
- We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.

Our Commercial or Business Purposes for Collecting or Disclosing Personal Data

- **Providing, Customizing and Improving the Services**
  - When you provide such information directly to us.
  - Processing orders or other transactions; billing.
  - Providing you with the products, services or information you request.
  - Meeting or fulfilling the reason you provided the information to us.
  - Providing support and assistance for the Services.
  - Improving the Services, including testing, research, internal analytics and product development.
  - Personalizing the Services, website content and communications based on your preferences.
  - Doing fraud protection, security and debugging.
  - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the "CCPA").
- **Marketing the Services**
  - Marketing and selling the Services.
  - Showing you advertisements, including interest-based or online behavioral advertising.
- **Corresponding with You**
  - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Webscale or the Services.
  - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
  - Fulfilling our legal obligations under applicable law, regulation, court order or other legal

process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
    - Protecting the rights, property or safety of you, Webscale or another party.
    - Enforcing any agreements with you.
    - Responding to claims that any posting or other content violates third-party rights.
    - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

4. How We Use Personal Data

We use Personal Data for the following purposes:

To Provide and Improve the Services

- Account creation, authentication, transaction processing
- Customer support and troubleshooting
- Service personalization
- Product development and analytics

For Security and Compliance

- Detecting and preventing fraud, abuse, and unauthorized access
- Ensuring system integrity
- Meeting audit, regulatory, and legal requirements

For Marketing (where permitted)

- Sending product updates or promotional messages
- Displaying relevant advertisements

For Legal Obligations and Rights

- Compliance with applicable laws, subpoenas, and requests
- Protecting Webscale, users, and third parties
- Enforcing our Terms of Use

We do not use Personal Data for materially different, unrelated purposes without notice or consent where required.

5. How We Disclose Personal Data

We may disclose Personal Data to:

Service Providers

- Hosting providers
- Cloud infrastructure and CDN partners

- Customer support platforms
- Analytics and monitoring tools
- Payment processors (Stripe)

Advertising & Analytics Partners
For permitted targeted advertising and performance analytics.

Business Transfers
If Webscale undergoes merger, acquisition, restructuring, or bankruptcy.

Legal Requirements
Where necessary to comply with the law or protect rights.

Aggregated/De-Identified Data
May be used for analytics or service improvement; cannot identify individuals.

We do not "sell" Personal Data as defined under CCPA/CPRA.
We may share data for cross-context behavioral advertising, which is considered "sharing" under CPRA; users may opt-out.

6. Cookies and Tracking Technologies

We use:

- **Essential Cookies** (required for service operation)
- **Functional Cookies** (preferences, language settings)
- **Analytics Cookies** (performance, behavior, product improvement)
- **Advertising Cookies** (interest-based ads)

Users may control cookies via browser settings or opt-out links provided.

We currently do **not** respond to **Do Not Track** signals.

7. Data Security

We implement administrative, technical, and organizational controls aligned with security best practices (including SOC 2 requirements).

However, no online system is completely secure. Users assume limited risk associated with data transmission.

8. Data Retention

We retain Personal Data only for:

- As long as your account is active, or
- As required to deliver services, meet legal obligations, enforce terms, or for legitimate business

purposes.

Where feasible, we anonymize or delete Personal Data once no longer required.

9. Children's Privacy

Our Services are not intended for individuals under **16 years**. We do not knowingly collect data from minors.
If we become aware that data from a child under 16 was collected, we will delete it promptly.

10. State-Specific Privacy Rights

Inclusive of new state laws (California, Colorado, Connecticut, Virginia, Utah).

California (CPRA) Rights:

- Right to know
- Right to delete
- Right to correct
- Right to opt-out of "sharing" for advertising
- Right to non-discrimination

Nevada:

Residents may opt-out of sale of Personal Data (we do not sell).

Colorado, Connecticut, Virginia, Utah:

New rights include:

- Right to access
- Right to correction
- Right to deletion
- Right to opt-out of targeted advertising and profiling

Requests may be submitted to:
📩 **security@webscalenetworks.com**

11. EU/UK GDPR Rights

If you are an EU/UK resident, you have:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object (including marketing)
- Right to withdraw consent
- Right to lodge complaints with supervisory authorities

Webscale acts as:

- **Controller** for website and user account data
- **Processor** for customer end-user data processed via our platform

12. International Data Transfers

We may transfer Personal Data to the U.S. and other countries.
Transfers are protected by:

- Standard Contractual Clauses (SCCs),
- UK Addendum,
- Data Processing Agreements,
- Additional safeguards where required.

13. Contact Information

Webscale Networks
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14. EU/UK Representative Information

EU Representative:
DP-Dock GmbH
Ballindamm 39, 20095 Hamburg, Germany
webscalenetworks@gdpr-rep.com

UK Representative:
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