

Privacy Policy

Effective starting: July 30, 2015

Introduction

This Privacy Policy explains what information ENTERTAINMENT COMMUNICATIONS Ltd. ("HYBRIDA") and its related entities collect about you and why, what we do with that information, how we share it, and how we handle the content you place in our products and services. It also explains the choices available to you regarding our use of your personal information and how you can access and update this information.

Scope of Privacy Policy

This Privacy Policy applies to the information that we obtain through your use of "HYBRIDA Services" via a "Device" or when you otherwise interact with HYBRIDA.

"**HYBRIDA Services**" include our:

- Websites
- SaaS Products
- Downloadable Products

but does not include:

- HYBRIDA products or services for which a separate privacy policy is provided.
- Third Party Products. These are third party products or services that you may choose to integrate with HYBRIDA product or services, such as third party Add-Ons available in the HYBRIDA Marketplace. You should always review the policies of third party products and services to make sure you are comfortable with the ways in which they collect and use your information.

A "**Device**" is any computer used to access the HYBRIDA Services, including without limitation a desktop, laptop, mobile phone, tablet, or other consumer electronic device. Unless otherwise stated, our SaaS Products and our Downloadable Products are treated the same for the purposes of this document.

By registering for or using HYBRIDA Services you consent to the collection, transfer, processing, storage, disclosure and other uses described in this Privacy Policy.

Definitions

Add-On: a bundle of code, resources and configuration files that can be used with an HYBRIDA product to add new functionality or to change the behavior of that product's existing features.

HYBRIDA application: a bundle of code, resources and configuration files that can be used with an HYBRIDA product to add new functionality or to change the behavior of that product's existing features.

Content: any information or data that you upload, submit, post, create, transmit, store or display in an HYBRIDA Service.

Downloadable Products: HYBRIDA's downloadable software products and mobile applications, including Add-Ons or applications created by HYBRIDA, that are installed by customers on an infrastructure of their choice. Downloadable Products do not include Add-Ons created by third parties, even when they are accessed through HYBRIDA.tv or available through the HYBRIDA Marketplace.

Information: all of the different forms of data, content, and information collected by us as described in this Privacy Policy.

Personal Information: information that may be used to readily identify or contact you as an individual person, such as: name, address, email address, or phone number. Personal Information does not include information that has been anonymized such that it does not allow for the ready identification of specific individuals.

SaaS Products: HYBRIDA's "Cloud" hosted solutions, as well as other HYBRIDA hosted solutions that display a link to this Privacy Policy. For the avoidance of doubt, if an HYBRIDA

hosted solution displays a link to a different privacy policy, then that other privacy policy shall apply.

Websites: HYBRIDA's websites, including but not limited to HYBRIDA.tv, bgitv.net, and any related websites, sub-domains and pages.

Changes to our Privacy Policy

We may change this Privacy Policy from time to time. If we make any changes, we will notify you by revising the "Effective Starting" date at the top of this Privacy Policy. If we make any material changes, we will provide you with additional notice (such as by adding a notice on the HYBRIDA Services homepages, login screens, or by sending you an email notification). We encourage you to review our Privacy Policy whenever you use HYBRIDA Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this Privacy Policy, you will need to stop using HYBRIDA Services and deactivate your account(s), as outlined below.

Information you provide to us

We collect the following information:

Account and Profile Information: We collect information about you and your company as you register for an account, create or modify your profile, make purchases through, use, access, or interact with the HYBRIDA Services (including but not limited to when you upload, download, collaborate on or share Content). Information we collect includes:

- Contact information such as name, email address, mailing address, and phone number
- Billing information such as credit card details and billing address
- Profile information such as a username, profile photo, and job title
- Preferences information such as notification and marketing preferences

You may provide this information directly when you enter it in HYBRIDA Services.

In some cases another user (such as a system administrator) may create an account on your behalf and may provide your information, including Personal Information (most commonly when your company requests that you use our products). We collect Information under the direction of our customers and often have no direct relationship with the individuals whose personal data we process. If you are an employee of one of our customers and would no longer like us to process your information, please contact your employer. If you are providing information (including Personal Information) about someone else, you must have the authority to act for them and to consent to the collection and use of their Personal Information as described in this Privacy Policy.

Content: We collect and store Content that you create, input, submit, post, upload, transmit, store or display in the process of using our SaaS Products or Websites. Such Content includes any Personal Information or other sensitive information that you choose to include ("incidentally-collected Personal Information").

Other submissions: We collect other data that you submit to our Websites or as you participate in any interactive features of the HYBRIDA Services, participate in a survey, contest, promotion, sweepstakes, activity or event, apply for a job, request customer support, communicate with us via third party social media sites or otherwise communicate with us. For example, information regarding a problem you are experiencing with an HYBRIDA product could be submitted to our Support Services or posted in our public forums.

Information we collect from your use of HYBRIDA Services

Web Logs: As is true with most websites and services delivered over the Internet, we gather certain information and store it in log files when you interact with our Websites and SaaS Products. This information includes internet protocol (IP) addresses as well as browser type, internet service provider, URLs of referring/exit pages, operating system, date/time

stamp, information you search for, locale and language preferences, identification numbers associated with your Devices, your mobile carrier, and system configuration information. In the case of our SaaS Product, the URLs you accessed (and therefore included in our log files) include usernames as well as elements of Content (such as JIRA project names, project keys, status names, and JQL filters, and Confluence page titles and space names) as necessary for the SaaS Product to perform the requested operations. Occasionally, we connect Personal Information to information gathered in our log files as necessary to improve HYBRIDA Services for individual customers. In such a case, we would treat the combined Information in accordance with this privacy policy.

Analytics Information from Website and SaaS Products:

We collect analytics information when you use our Websites and SaaS Products to help us improve our products and services. In the SaaS Products, this analytics information consists of the feature and function of the HYBRIDA Service being used, the associated license identifier (SEN) and domain name, the username and IP address of the individual who is using the feature or function (which will include Personal Information if the Personal Information was incorporated into the username), the sizes and original filenames of attachments, and additional information required to detail the operation of the function and which parts of the HYBRIDA Services are being affected. For example:

- In HYBRIDA, analytics information that we collect when a user creates a project includes the system-generated numeric identifier of the project, the project key input by the user, the name of the template used (if any), and the name of the project. Similarly, analytics information that we collect when an issue is edited includes the system-assigned numeric issue id, the issue key (which consists of the project key and a system-generated sequence number), whether the edit is made by a user or automatically generated by the system, and whether email notifications are to be sent.
- In Confluence, analytics information that we collect when a user creates a page includes the system-generated numeric

identifier of the page, the blueprint used to create the page, the key of the space in which the page is being created, and the page title. An example of analytics information that we collect when a user creates a new blueprint includes the system-generated numeric identifier of the blueprint, the key of the space in which the blueprint is being created, and the blueprint name and description.

As shown in the examples above, the analytics information we collect includes elements of Content related to the function the user is performing. As such, the analytics information we collect may include Personal Information or sensitive business information that the user has included in Content that the user chose to upload, submit, post, create, transmit, store or display in an HYBRIDA Service.

As of the date this policy went into effect, we use HYBRIDA Analytics.

Analytics Information Derived from Content. Analytics information also consists of data we collect as a result of running queries against Content across our user base for the purposes of generating Usage Data. "Usage Data" is aggregated data about a group or category of services, features or users that does not contain Personal Information. For example, we may query Content to determine the most common types of workflows that users use (e.g. what percentage of all instances use ITIL style workflows?) by searching for the most common workflow names, or we may query Content to determine the most popular job titles for Confluence users in order to better understand the composition of our user base.

Though we may happen upon sensitive or Personal Information as we compile Usage Data from Content across user instances, this is a by-product of our efforts to understand broader patterns and trends. It is not a concerted effort by us to examine the Content of any particular customer.

Analytics Information from Downloadable Products: We collect analytics information when you use our Downloadable Products to help us improve our products and services. Our Downloadable Products contain a feature that sends information about the technical operation of the Downloadable Products on

your systems ("System Information") to us. System Information includes information about:

(a) the server environment in which the Downloadable Product is operating: OS type and version, JVM version, Java environment properties, CPU type, RAM allocation, language and locale settings, database type and version, and disk utilization, as well as

(b) user client information, for example: browser type and version, native client type and version, and client device specifications (e.g. screen resolution, OS version, device type, etc.). In addition, we collect analytics information from Downloadable Products that is a subset of the analytics information described above for Websites and SaaS Products. As with Websites and SaaS Products, the analytics information we collect includes elements of Content related to the function the user is performing, but with an important caveat. With the Downloadable Products, before sending the information to HYBRIDA's servers, we filter the analytics information to remove elements that we believe may contain sensitive or Personal Information. For example:

(1) we conduct a one-way hash of usernames and hostnames before collecting them and

(2) we filter any Content elements we collect to discard all words except those on a list of common business and IT terminology. You can disable our collection of analytics information from Downloadable Products via the Administrator settings or by blocking collection at the local network level.

Installer Analytics, Software Updates & License

Information from Downloadable Products: During the installation of our Downloadable Products, the installer sends analytics information to HYBRIDA to allow us to understand where in the installation process users are experiencing trouble or dropping out. Our Downloadable Products also communicate with HYBRIDA servers for licensing purposes, as well as to check for updates, patches, and compatibility with Add-Ons. Examples of information we collect for these purposes include the name and version of the Downloadable Product and the server ID, SEN, and IP address of the customer instance.

Cookies and Other Tracking Technologies: HYBRIDA and our third party partners, such as our advertising and analytics

partners, use various technologies to collect information, such as cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory. We use cookies to improve and customize HYBRIDA Services and your experience; to allow you to access and use the Websites or SaaS Products without re-entering your username or password; and to count visits and understand which areas and features of the Websites and SaaS Products are most popular. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of our Websites or SaaS Products. HYBRIDA and our third party partners also collect information using web beacons (also known as "tracking pixels"). Web beacons are electronic images that may be used in our Websites or SaaS Products or in emails that help us to deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon.

HYBRIDA and our third party partners also use JavaScript, e-tags, "flash cookies", and HTML5 local storage to collect information about your online activities over time and across different websites or online services. Many browsers include their own management tools for removing HTML5 local storage objects. To manage "flash cookies" please click [here](#). You may be able to opt out of receiving personalized advertisements as described below under "Your Choices."

Information we collect from other sources

Information from third party services: We also obtain information from third parties and combine that with Information we collect through HYBRIDA Services. For example, we may have access to certain information from a third party social media or authentication service if you log into HYBRIDA Services through the service or otherwise provide us with access to Information from the service. Any access that we may have to such Information from a third party social or authentication service is in accordance with the authorization procedures determined by that service. By authorizing us to connect with a third party service, you authorize us to access

and store your name, email address(es), current city, profile picture URL, and other information that the third party service makes available to us, and to use and disclose it in accordance with this Privacy Policy. You should check your privacy settings on these third party services to understand and change the information sent to us through these services.

How we use Information we collect

General Uses: We use the Information we collect about you (including Personal Information to the extent applicable) for a variety of purposes, including to:

- Provide, operate, maintain, improve, and promote HYBRIDA Services;
- Enable you to access and use HYBRIDA Services, including uploading, downloading, collaborating on and sharing Content;
- Process and complete transactions, and send you related information, including purchase confirmations and invoices;
- Send transactional messages, including responding to your comments, questions, and requests; providing customer service and support; and sending you technical notices, updates, security alerts, and support and administrative messages;
- Send promotional communications, such as providing you with information about services, features, surveys, newsletters, offers, promotions, contests, events and sending updates about your team and chat rooms; and providing other news or information about us and our select partners. You have the ability to opt out of receiving any of these communications as described below under "Your Choices";
- Process and deliver contest or sweepstakes entries and rewards;
- Monitor and analyze trends, usage, and activities in connection with HYBRIDA Services and for marketing or advertising purposes;
- Investigate and prevent fraudulent transactions, unauthorized access to HYBRIDA Services, and other illegal activities;

- Personalize HYBRIDA Services, including by providing content, features, or advertisements that match your interests and preferences;
 - Enable you to communicate, collaborate, and share Content with users you designate; and
 - For other purposes about which we obtain your consent.
- Notwithstanding the foregoing, we will not use Personal Information appearing in our Analytics Logs or Web Logs for any purpose. The use of Information collected through our HYBRIDA Services shall be limited to the purposes disclosed in this policy.

Compiling aggregate analytics information: Because our SaaS Products and Downloadable Products are some of the most configurable in the market, we make extensive use of analytics information (including log and configuration data) to understand how our products are being configured and used, how they can be improved for the benefit of all of our users, and to develop new products and services. As such we generate Usage Data (as defined above) from the web logs and analytics logs described above, including the Content elements captured in such logs, as well as from the Content stored in the Websites and SaaS Products.

Information sharing and disclosure

We will not share or disclose any of your Personal Information or Content with third parties except as described in this policy. We do not sell your Personal Information or Content.

Your Use: When you use HYBRIDA Services, Content you provide will be displayed back to you. Certain features of HYBRIDA Services allow you or your administrator to make some of your Content public, in which case it will become readily accessible to anyone. We urge you to consider the sensitivity of any data you input into HYBRIDA Services.

Collaboration: As a natural result of using HYBRIDA Services, you may create Content and grant permission to other HYBRIDA users to access it for the purposes of collaboration. Some of the collaboration features of HYBRIDA Services display

your profile information, including Personal Information included in your profile, to users with whom you have shared your Content. Where this information is sensitive, we urge you to use the various security and privacy features of the HYBRIDA Services to limit those who can access such information. Your sharing settings may make any Information, including some Personal Information, that you submit to the HYBRIDA Services visible to the public, unless submitted to a restricted area.

Access by your system administrator: You should be aware that the administrator of your instance of HYBRIDA Services may be able to:

- access information in and about your HYBRIDA Services account;
- access communications history, including file attachments, for your HYBRIDA Services account;
- disclose, restrict, or access information that you have provided or that is made available to you when using your HYBRIDA Services account, including your Content; and
- control how your HYBRIDA Services account may be accessed or deleted.

HYBRIDA Community: Our Websites offer publicly accessible community services such as blogs, forums, bug trackers, and wikis. You should be aware that any Content you provide in these areas may be read, collected, and used by others who access them. Your posts may remain even after you cancel your account. To request removal of your Personal Information from the HYBRIDA Community, please contact us using the information listed below. In some cases, we may not be able to remove your Personal Information, in which case we will let you know if we are unable to and why.

Service Providers, Business Partners and Others: We work with third party service providers to provide website, application development, hosting, maintenance, back-up, storage, virtual infrastructure, payment processing, analysis and other services for us. These service providers may have access to or process your Information for the purpose of

providing those services for us. Some of our pages utilize white-labeling techniques to serve content from our service providers while providing the look and feel of our site. Please be aware that you are providing your Information to these third parties acting on behalf of HYBRIDA.

Third Party applications: You may choose to make use of third party applications in conjunction with HYBRIDA Services. Third party applications are software written by third parties to which you grant access privileges to your Content (which may include your Personal Information). When access is granted, your Content is shared with the third party. Third party applications policies and procedures are not controlled by HYBRIDA even though the third party applications may be available through HYBRIDA Services. Third parties who have been granted access to your Content through applications could use this data to contact you and market services to you, and could share your data with other third parties. This Privacy Policy does not cover the collection or use of your data by third party applications, and we urge you to consider the privacy policies governing third party applications. If you object to your Personal Information being shared with these third parties, please uninstall the applications (in the event installed from the HYBRIDA Marketplace) or terminate your agreement with the third party applications provider (in the event you have purchased a direct integration).

Links to Third Party Sites: The HYBRIDA Services may include links to other websites whose privacy practices may differ from ours. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

Social Media Widgets: The HYBRIDA Services may contain social media features, such as the Twitter "tweet" button. These features may collect your IP address, which page you are visiting on the HYBRIDA Services, and may set a cookie to enable the feature to function properly. Social media features and Widgets are either hosted by a third party or hosted directly on our HYBRIDA Services. Your interactions with these

features are governed by the privacy policy of the company providing it.

Testimonials: We may display personal testimonials of satisfied customers on the HYBRIDA Services. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us using the information below.

Compliance with Laws and Law Enforcement Requests; Protection of Our Rights: We may disclose your Information (including your Personal Information) to a third party if

- (a) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request,
- (b) to enforce our agreements, policies and terms of service,
- (c) to protect the security or integrity of HYBRIDA's products and services,
- (d) to protect HYBRIDA, our customers or the public from harm or illegal activities, or
- (e) to respond to an emergency which we believe in the good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

Business Transfers: We may share or transfer your Information (including your Personal Information) in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the HYBRIDA Services of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

Aggregated or Anonymized Data: We may also share aggregated or anonymized information that does not directly identify you with the third parties described above.

With Your Consent. We will share your Personal Information with third parties when we have your consent to do so.

Information we do not share

We do not share Personal Information about you with third parties for their marketing purposes (including direct marketing purposes) without your permission.

Data storage, transfer and security

HYBRIDA hosts data with hosting service providers in numerous countries. The servers on which Personal Information is stored are kept in a controlled environment. While we take reasonable efforts to guard your Personal Information, no security system is impenetrable and due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers. In addition, we cannot guarantee that any incidentally-collected Personal Information you choose to store in Websites or SaaS Products are maintained at levels of protection to meet specific needs or obligations you may have relating to that information.

Where data is transferred over the Internet as part of a Website or SaaS Product, the data is encrypted using industry standard SSL (HTTPS).

Where Downloadable Products are used, responsibility of securing access to the data you store in the Downloadable Products rests with you and not HYBRIDA. We strongly recommend that administrators of Downloadable Products configure SSL to prevent interception of data transmitted over networks and to restrict access to the databases and other storage used to hold data.

Your Choices

You may opt out of receiving promotional communications from HYBRIDA by emailing us to have your contact information removed from our promotional email list or registration database. Although opt-out requests are usually processed immediately, please allow ten (10) business days for a removal request to be processed. Even after you opt out from receiving

promotional messages from us, you will continue to receive transactional messages from us regarding HYBRIDA's Services.

Accessing and updating your information

You may often correct, update, amend, or remove your Personal Information in your account settings or by directing your query to your account administrator. You may also contact Support Services, or contact us by postal mail using the address listed below. We will respond to your request for access within 30 days.

International users

If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your Personal Information to Republic of Bulgaria to us. By providing your Personal Information, you consent to any transfer and processing in accordance with this Policy.

Contact Us

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