

ON24 Safe Harbor Privacy Policy

Per information provided on the US Department of Commerce website, we alert you to the fact that the European Commission's Directive on Data Protection went into effect in October of 1998, and prohibits the transfer of personal data to non-European Union nations that do not meet the European "adequacy" standard for privacy protection. The United States government takes a different approach to privacy from that taken by the European Union.

In order to bridge these different privacy approaches and provide a streamlined means for U.S. organizations to comply with the Directive, the U.S. Department of Commerce in consultation with the European Commission ("EU") developed a "Safe Harbor" framework (hereinafter referenced as "Safe Harbor"). ON24 seeks to adhere to the various Safe Harbor principles as outlined below:

1. Privacy Principles

The privacy principles detailed on the ON24 website meet the general goals of the EU mandates on protecting personal data that we collect.

2. Notice and Choice

ON24 does not collect personal information from individuals within the EU without providing notice to those individuals that such information will be collected. Furthermore, the vast majority of information collected by ON24 is limited to name, email address and location, although on rare occasions we may ask individuals to voluntarily provide more detailed information. Users of our web services from the EU may decline to provide this information at any time, but we cannot guarantee that such user will have full access to all of our services. To the extent permitted in the Safe Harbor Agreement, ON24 reserves the right to process personal information in the course of providing webcasting and other services to our clients without the knowledge of individuals involved.

3. Onward Transfers and Disclosures

ON24 will not knowingly disclose an individual's personal data or information to third parties, except when one or more of the following conditions is met:

- a. ON24 has the individual's permission to make such a disclosure.
- b. A disclosure is required by law or professional standards.
- c. The information is publicly available or easily accessible from other sources.
- d. A disclosure is reasonably necessary for the establishment or defense of any legal claims.

4. Data Security

ON24 maintains a stringent and monitored data security system with various levels of backup and security layering based on top industry standard physical, electronic and procedural administration to safeguard and secure any information or data we have collected and store in our database or equipment.

5. Data Integrity

ON24 affirms that any personal information or data collected will be used only in ways that are compatible with the purposes for which it is collected and that relates to our business services.

6. Access to Personal Information

Upon request, ON24 will make reasonable efforts to grant EU individuals access to their own personal information or data that ON24 may hold. In addition, ON24 will make reasonable

efforts to allow such individuals the ability to correct, amend or delete such information or data that is verified to ON24 as being inaccurate or incomplete.

7. Enforcement

ON24 utilizes a self-assessment approach to ensure compliance with its privacy statements. ON24 periodically verifies that the policy is accurate, comprehensive for the information and data intended to be covered, prominently displayed, completely implemented, and is in conformity with the Safe Harbor principles. ON24 will cooperate with the EU Data Protection Authorities and the U.S. Department of Commerce to resolve any complaints and disputes arising in connection with its privacy policy. An individual with any privacy or security concerns may contact the Compliance and Operations department for ON24 at 799 Market Street, 6th Floor, San Francisco, California, 94103 USA. ON24 make reasonable efforts to investigate any reported complaints regarding violations of its privacy policy and will take prompt remedial action where violations are verified by its internal review. If an individual is unsatisfied with ON24's resolution of the complaint, then ON24 or that individual may file a request for mediation of a privacy issue with the American Arbitration Association at www.adr.org or via our address listed above.

8. Changes in Practices

ON24 will maintain this policy as current and will make every reasonable effort to update this information as soon as any changes are made.