

MicroStrategy Customer Badge Privacy Notice

Last modified: April 7, 2017

1 Introduction

This privacy notice (the “Notice”) is provided by MicroStrategy Incorporated and its subsidiaries (collectively, “MicroStrategy”, “Company”, “we” or “our”). MicroStrategy respects your privacy.

The Company uses the Usher enterprise security platform (“Usher”) to control access to certain of its logical systems, such as the MicroStrategy Resource Center, Cornerstone, and our support site, among others (the “MicroStrategy Resources”) and for the other purposes set out in this Notice. In order to obtain and use your Usher badge, you will first need to download the Usher mobile software application (the “Usher App”) to your mobile device. If you do not agree to the terms in this Notice, please do not obtain this Usher badge.

This Notice describes: (i) what personal information relating to MicroStrategy customers (“customers” or “you”) is collected through use of Usher and the Usher App; (ii) how the Company may use such information; (iii) who has access to such information; (iv) to whom we may disclose such information; (v) your rights to review your information; (vi) the measures we have taken to keep your personal information secure; and (vii) how you can contact us about our privacy practices.

Note that this Notice only covers data collected through Usher and the Usher App. The Company is the data controller for the purposes of this Notice.

2 Personal Information Usher Collects About You

When you receive an invitation to join the Usher network or when you accept and download the Usher badge, the Usher server will initially collect the following information about you (the “User Information”):

- name,
- job title,
- organization name,
- phone number,
- email address,
- the unique device identifier of the mobile device (“Device ID”), and
- photo (if provided by you).

In addition to the User Information collected when you initially join the Usher network, the Usher server will automatically collect the following further information (the “Transaction Data”) from your mobile device when you use Usher to access a MicroStrategy Resource, request a new cryptographic code from the Usher server (a “Code Request”), perform peer validation, scan a barcode, upload a photo to your Usher badge, receive or respond to a message, survey or questionnaire sent through the Usher App, download or recover an Usher badge on a mobile device, or delete an Usher badge from a mobile device (each of the foregoing, an “Usher Transaction”):

- name,
- type of Usher Transaction,

- time and date of the Usher Transaction,
- the model and operating system of the mobile device that was used to perform the Usher Transaction,
- the Device ID of the mobile device that was used to perform the Usher Transaction,
- for peer validation Usher Transactions, the name of the individual(s) that were validated,
- for Usher Transactions involving responding to a survey or questionnaire, your response to the survey or questionnaire,
- for Usher Transactions involving scanning a barcode, the item that was scanned,
- for logical access Usher Transactions, which MicroStrategy Resource was accessed and whether access was granted or denied, and
- your location when the Usher transaction occurs.

The Usher App is configured to request automatically (without prompting from the user) a new cryptographic code every 60 seconds if the Usher App is open in the foreground of a mobile device. Therefore, if you leave the Usher App open in the foreground of your mobile device, the Usher App will continue to make Code Requests and the Usher server will collect the associated Usher Data even if you are not using the Usher App. You can avoid this by not leaving the Usher App open in the foreground of your mobile device when the Usher App is not in use.

In summary, Usher Data is collected only at the time of an Usher Transaction and not at any other time.

3 How the Company Uses the Usher Data

We use your Usher Data only for the following purposes:

- to administer the Usher service (e.g. Usher needs to know the operating system of your mobile device so that it can interact with your mobile device properly, and Usher needs your identity information in order for the Usher badge to serve as an identity credential and control access to MicroStrategy Resources),
- to secure the MicroStrategy Resources,
- to provide technical support in connection with your use of Usher,
- to perform analytics regarding the Usher network,
- to perform testing and development work for Usher (e.g. we may run test or example reports using Usher Analytics or we may run reports to determine how customers use various features of the Usher App),
- to perform product marketing and demonstration of Usher (including demonstrations regarding features and reporting capabilities of Usher, the Usher App, Usher Professional, and Usher Analytics), and
- to communicate with you through the Usher App.

4 Disclosure of Your Usher Data

In order to carry out the purposes outlined in Section 3 of this Notice, the Usher Data will be disclosed to certain MicroStrategy IS/IT, technology, marketing, and education personnel and may also be disclosed to certain MicroStrategy senior executives (the “Allowed Personnel”). The Allowed Personnel will not use your Usher Data other than for the purposes outlined in Section 3 of this Notice.

We may also disclose your Usher Data to third party service providers who perform services on our behalf (e.g. if we hire a third party to provide technical support for Usher, we would need to provide that third party access to the Usher Data in connection with performing that service). We do not authorize these service providers to use or disclose your Usher Data except as necessary to perform services on our behalf or to comply with legal requirements. We require these service providers by contract to safeguard the privacy and security of your Usher Data that they process on our behalf.

In addition, we reserve the right to disclose any Usher Data if we are compelled to do so by a court order or to comply with law.

5 Updating or Accessing Your Personal Information

Where required by applicable law, upon your request (pursuant to Section 9 of this Notice), we will provide you with access to the Usher Data we have retained about you and you will be given the opportunity to review such Usher Data and request corrections, updates or deletions of inaccurate Usher Data.

We reserve the right to charge you a fee, where permitted under applicable law, which is usually approximately \$20, for processing each such request. Where you make more than one request in quick succession, where permitted under applicable law we may respond to your subsequent request by referring to our earlier response and only identifying items that have changed materially.

6 International Data Transfers

We transfer the Usher Data to certain of our affiliates and to a server hosting provider (“Host”). The affiliates and the Host are located in the U.S. The laws in the U.S. may not offer the same level of data protection as the country in which the Usher Data was initially provided. The purpose of the transfer of the Usher Data to our affiliates and the Host is that the servers that store the Usher Data are located in the U.S. and some of the Allowed Personnel are employees of our affiliates. When we transfer the personal data to our affiliates and the Host, we will protect the data as described in this Notice and in accordance with applicable law.

7 How We Hold and Protect Your Personal Information

The security of your personal information is important to the Company. We are committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We use encryption when we transfer the Usher Data between the Usher App and the Usher server.

In order to fulfill the purpose for which the Usher Data was collected, the Company stores the Usher Data for one hundred and eighty days (180) days from the date it is collected, unless otherwise required or authorized by applicable law. We take measures to destroy or permanently anonymize personal information if required

by law or if the personal information is no longer required for the purpose for which we collected it.

8 Changes to this Notice

The Company will notify you of any significant changes to this Notice and at the top of this Notice we will state the date it was most recently updated.

9 Requests for Access to Information / Questions

If you have any questions about this Notice or if you would like to submit a request (in the manner described in Section 5 above) for access to the Usher Data we maintain, you may contact us by sending an email to info@microstrategy.com. Questions or comments submitted through other means may not be received or addressed.