

## **PRIVACY POLICY**

Thank you for visiting aptivada.com (the “Site”), which is owned and operated by Aptivada, LLC, a Delaware limited liability company (“Aptivada,” “us,” “our,” or “we”). Aptivada takes privacy and transparency very seriously. Please read the following privacy policy (the “Policy”) to understand how we collect, use, maintain and disclose the Personal Information users (each, a “User”) of the Site as well as all of our other applications, software, and services (together, and collectively with the Site, the “Service”). For purposes of this Policy, “Personal Information” means information that can or potentially can be used on its own or with other information to de-anonymize data or to identify, contact, or locate a single person.

By using this Site or any part of the Service, you signify your acceptance of this Policy. If you do not agree to this Policy, please do not use the Service.

This Policy only covers Personal Information collected by and on behalf of Aptivada—it does not apply to Personal Information we may collect for or on behalf of third parties. See the section below entitled “Promotions” for additional details.

### **Personally Identifiable Information**

We may collect Personal Information from Users in a variety of ways, including, but not limited to, when Users visit our site, register on the site, subscribe to our newsletter, fill out a form, or in connection with other activities, services, features or resources we make available. We only collect Personal Information that Users provide voluntarily. Users may visit the Site anonymously and refuse to provide Personal Information; however, to make full use of the Service, Users may be required to provide a name, email address, or other Personal Information.

We disclose Personal Information only to our employees, contractors and affiliated organizations that (i) need to know that information in order to process it on our behalf or to provide the Services, and (ii) that have agreed not to disclose it to others. Some of those employees, contractors and affiliated organizations may be located outside of your home country; by using Service, you consent to the transfer of such information to them. In some cases, we may provide Personal Information to the sponsors of contests and promotions we operate from time to time.

Except for disclosures to sponsors, as described in the preceding paragraph, we will not rent or sell Personal Information to anyone. Other than as described in the preceding paragraph and the following section, we disclose Personal Information only in response to a subpoena, court order or other governmental request, or when we have a good-faith belief that disclosure is reasonably necessary to protect the property or rights of Aptivada, third parties or the public at large.

If you are a registered user of the Service and have given us your email address, we may occasionally send you emails to tell you about promotions and new features, to solicit your feedback, or to notify you of important changes, updates, or events related to the Service. You may choose to opt out of such promotional messages and other bulk communications. We

primarily use social media and our blog to communicate this type of information, so we expect to keep this type of communication to a minimum.

If you send us a request (for example, a request for technical support) through an email to customer support or through our other feedback mechanisms, we reserve the right to publish it (with all Personal Information removed) in order to help us clarify or respond to your request or to help us support other Users.

We take all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of Personal Information.

### **How We Use Collected Information**

We may collect and use your Personal Information for the following purposes:

- To efficiently respond to your customer service requests and related needs;
- To run a promotion, contests, surveys, etc.;
- To send you information you have agreed to receive about topics we think will interest you;
- To send periodic emails as described above and to respond to your questions or other requests.

Although we do not sell, trade, or rent Users' Personal Information to third parties (other than disclosures to sponsors, as described above), we may share generic aggregated demographic information about Users that is not linked to any Personal Information with our business partners, trusted affiliates and advertisers for the purposes outlined above.

We may use third party service providers to help us operate the Service and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your Personal Information with these third parties for those limited purposes provided that you have given us your permission.

### **Other Information**

We may collect information about Users other than Personal Information whenever they interact with our Site or Service. Such information may include the browser name, the type of computer and technical information about Users' means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

## **Social Media Logins**

Our Service allows you to connect social media accounts to your User profile. This allows us to see information related to your social media accounts, including but not limited to your social profile URLs and associated profile photos.

- We will never use or post to these accounts without your permission and will always require your interaction with the widget to execute any specific actions.
- We will only use information that you have made public or allowed us to access.
- We do not receive or store any passwords associated with your social media accounts.
- If you wish to remove the link between Aptivada and any social media service, you can do so from within that specific social network.

## **Promotions**

We design and implement online sweepstakes, surveys, quizzes, contests, and other competitions and promotions (“Promotions”) for third parties (each, a “Promoter”). All Personal Information you provide in connection with a Promotion is collected by our software and stored on our servers but belongs to the Promoter responsible for the Promotion and is subject to the Promoter’s privacy policy and other terms. We do not use or share Personal Information collected in connection with Promotions unless we are the Promoter, and we do not allow any party to access such Personal Information other than the Promoter responsible for collecting such Personal Information. However, we may use anonymous, aggregated data collected in connection with Promotions pursuant to the terms of this Policy.

## **Cookies**

A cookie is a string of information that a website stores on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns. Our Site uses cookies to help us identify and track Users, their usage of the Site, and their website access preferences. The cookie itself does not contain Personal Information; however, if you provide Personal Information to us, the cookie may act as an identifier to tie your Personal Information to your IP address or computer. Users who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the Site; however, certain features of the Site may not function properly without the aid of cookies.

## **Credit Card Information**

We use Stripe, a third-party payment processor, to process our credit card payments. We do not collect your credit card information or store such information on our servers.

## **Information Security**

We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete, up-to-date and relevant and stored securely. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

Sensitive and private data exchange between the Site and its Users happens over a SSL secured communication channel and is encrypted in transit and protected with digital signatures. Such data may not be encrypted when stored in our databases or on our servers.

## **Third Party Websites**

Users may find advertising or other content on our Site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

## **Compliance With Children's Online Privacy Protection Act**

We do not knowingly collect Personal Information from children under 13. If we discover that a child under the age of 13 has provided us with Personal Information, we will promptly take steps to delete the information.

## **Business Transfers**

In some cases, we may choose to buy or sell assets. In these types of transactions, customer information is typically one of the business assets that are transferred. Moreover, if Aptivada, or substantially all of its assets were to be acquired, or in the unlikely event that Aptivada goes out of business or enters bankruptcy, customer information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any party that acquires Aptivada or its assets may continue to use your Personal Information according to the terms of this Policy.

## **Changes To This Privacy Policy**

Although most changes are likely to be minor, we may change this Policy at any time and in our sole discretion. We encourage Users to frequently check this page for any changes to this Policy. Your continued use of the Service after any change in this Policy constitutes your acceptance of such changes.

## **Your California Privacy Rights**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit [California Consumer Privacy Act](#).

## **What To Do if You Have a Complaint**

If you have any concerns or problems with the way your personal data has been handled, please contact Aptivada's Data Security Officer at [privacy@aptivada.com](mailto:privacy@aptivada.com). To assist us in dealing with your complaint, please provide the following:

- Full name of the person lodging the complaint
- Contact details
- How the Personal Data was collected, if known
- Details of the complaint
- Timeframe over which the suspected wrongdoing occurred
- Documentary evidence in support of the complaint.

## **Complaints Procedure**

Upon receiving your complaint, Aptivada's Data Security Officer will confirm that your complaint will be investigated and provide you with an estimate of how long you should expect to wait to receive a full response. While Aptivada endeavors to respond as promptly as possible, response times will vary depending on the nature of the complaint. The Data Security Officer will liaise with the relevant departments to investigate your complaint. You will be notified of the investigation outcome in writing within reasonable time and any action(s) taken if your complaint has been upheld, or your right of appeal where your complaint has been rejected.

## **Appeals Process**

If you feel that your complaint has not been resolved satisfactorily by Aptivada's Data Security Officer, you may appeal to the members of Aptivada's Board of Directors within fourteen (14) days of receipt of the written notice of the Data Security Officer informing you of the outcome of the investigations into your complaint.

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