

PRIVACY POLICY

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1. Who are we?

This Privacy Policy describes how SocialDatabase, Inc., a Delaware corporation (referred to herein as “SocialDatabase”, “we” or “us”) and its affiliates protects the personal data we may collect about visitors to our website and any other individual or entity (“you”, or “your”). This Privacy Policy serves as our external-facing description of our data collection and privacy practices and explains what information we collect, why we use it, who we share it with, and how we protect it. This Privacy Policy applies to our data collection and privacy practices, including when we collect personal data through your use of the website, www.socialdatabase.com and other SocialDatabase-related sites (each, a “Site” and collectively, the “Sites”), through our social media pages that we control and through email messages that we may send to you (collectively, the “Services”).

Our Privacy Policy does not apply to services offered by other companies or individuals, including sites that may be displayed to you, or other sites linked from our Services. If you have any questions or comments about this Privacy Policy, please submit a request to privacy@socialdatabase.com.

2. What data do we collect?

We use the term “Personal Data” to refer to any information that identifies or can be used to identify you. Common examples of Personal Data include: full name, email address, information about your device and certain metadata. We collect Personal Data in the following ways:

- Information You Give to Us on Our Sites

When you visit our Site, you may choose to provide us with Personal Data about yourself, including your name, business name, location, email address and other information by completing forms on our website.

For business purposes, we collect information about individuals and companies who may work with us (“Customer Information”). We treat Customer Information, and information about our Customer’s contacts, as the confidential and proprietary information of our customer, subject to the terms of the agreement between SocialDatabase and the Customer.

If you are a current or future customer of the SocialDatabase platform, you or your employer may provide your contact details, such as an email address, in order for you to access a SocialDatabase account. As part of your business relationship with us, we may also receive Personal Data about you or your company.

- Information We Obtain from Your Use of Our Sites

We collect certain information automatically, such as your operating system version, browser type, and Internet service provider. When you use our website, we automatically collect and store this information in service logs. This includes: details of how you used our website; Internet protocol address; cookies that uniquely identify your browser, the referring web page and pages visited. We may also collect and process

information about your actual location. The information we collect automatically is statistical data and may or may not include Personal Data, but we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties.

We and our partners use various technologies to collect and store information when you visit one of our Sites, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to collect and store information when you interact with services from our partners, such as advertising services. Our third party advertising and analytics partners include Google and similar partners.

The technologies we use for this automatic data collection may include:

- Cookies. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Services.
- Web Beacons. Our Sites or our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count visitors who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- Clickstream Data. Clickstream data is information collected by our computers when you request webpages from the website. Clickstream data may include information such as the page served, the time spent viewing the page, source of the request, type of browser making the request, the preceding page viewed and similar information. Clickstream data permits us to analyze how visitors arrive at the website, what type of content is popular, what type of visitors in the aggregate are interested in particular kinds of content on the website.
- Information We Obtain from Public Sources

SocialDatabase creates audiences for its customers by collecting information about people from publicly available sources. As a result, we may collect information about you from publicly accessible sites, such as social media platforms including Twitter. The information we collect may include Personal Data, personal content, social media quotes, demographic information, location information, interest information, professional or employment related information, and any other information you publish on an Internet website or social media platform that is publicly available, and information that we may infer about you from this data. We combine this information and make it available to our customers.

- Information We Obtain from SocialDatabase Customers

SocialDatabase customers (“SocialDatabase Customer”) engage us to deliver Services to their employees and other users. We collect information about individuals within our SocialDatabase Customer organization (“Customer Information”). Customer Information may include information related to the Customer’s account, name, work email address, work phone number, job title or similar kinds of information. We use Customer Information to support the Customer account, maintain our business relationship with the Customer, respond to Customer inquiries, or perform accounting functions. SocialDatabase Customers may contact

SocialDatabase support in order to delete their Personal Data. We may use Customer Information to contact you in the future to tell you about services, promotions, opportunities, and other general information about SocialDatabase we believe will be of interest to you.

3. For what purposes do we use your data?

We may use your Personal Data collected through our website and collected from our Customers for the following purposes:

- To provide services to our clients for lawful business purposes;
- To inform you about services and products available from SocialDatabase;
- To validate your identity or verify communication from you;
- To offer and administer programs;
- For marketing purposes, including but not limited to, personalizing email marketing that we send to you, sending you other promotional materials, creating profiles and notifying you about special offers, events or opportunities that may be interest to you;
- To improve our customer service; conduct customer satisfaction; market research and quality assurance reviews;
- To respond to and support users regarding their use of the Sites;
- To administer general recordkeeping;
- To comply with all applicable legal requirements;
- To use statistical information that we collect in any way permitted by law, including from third parties in connection with their commercial and marketing efforts;
- To enforce our Terms and other agreements;
- To investigate possible fraud or other violations of our Terms or this Privacy Policy and/or attempts to harm our users;
- To resolve disputes; and
- To otherwise fulfill the purpose for which the information was provided.

4. What is the legal basis for our processing of your data?

Whenever we process Personal Data provided directly to us, we may do so on the following legal bases:

- Your consent to such collection and use;
- Out of necessity for the performance of an agreement between us and you, such as your request for Services;
- As required by us to enable our business and pursue our legitimate interests. In particular we use your data for the following purposes:
 - General business operations and diligence;
 - Intra-organization transfers for administrative purposes
 - Product development and enhancement, where the processing enables SocialDatabase to enhance, modify, personalize, or otherwise improve our services and communications, including marketing strategy, for the benefit of our Users, and to better understand how people interact with our Sites;

In the performance of processing your Personal Data for our legitimate business interests we have, to the

greatest extent possible, taken all measures to minimize the impact such processing has and will have on you and your rights and interests involved.

- Disclosures to Customers

5. Who will we share this data with?

We may disclose Personal Data and other information that we collect from publicly available sources to our customers. Where we collect data from publicly available sources such as Twitter, we will share that information with our customers.

- Disclosures to Service Providers

We share Personal Data with a limited number of our service providers. We have service providers that provide services on our behalf, such as website hosting, information technology and related infrastructure, customer service, email delivery, and auditing services. We authorize such service providers to use or disclose the Personal Data only as necessary to perform services on our behalf or comply with legal requirements.

Personal Data may be shared with other third parties for the following purposes, including to:

- Meet any applicable law, regulation, legal process or enforceable governmental request;
 - Enforce applicable Terms and contractual agreements, including investigation of potential violations;
 - Detect, prevent or otherwise address fraud, security or technical issues;
 - Protect against harm to the rights, property, assets or safety of SocialDatabase or the public, or to protect the SocialDatabase website from misuse, as required or permitted by law;
 - Facilitate a business transfer, such as to a buyer or other successor in the event of merger acquisition, consolidation, divestiture, change in control, dissolution or other sale or transfer of some or all of SocialDatabase's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by SocialDatabase will be among the assets to be transferred, and any such successor may use your information for the same purposes set forth in this Notice;
 - For any other purpose disclosed when you provide the information; and
 - When we obtain your consent to do so.
- Disclosures for Legal Reasons

We may disclose collected Personal Data if we believe in good faith that such disclosure is required to comply with lawful requests. We attempt to notify you about legal demands for your Personal Data when appropriate in our judgment, unless prohibited by law or court order or when the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

6. Where will we send your data?

We may, directly or indirectly through third-party entities around the world, process, store and transfer information you provide, including your Personal Data, as described in this Privacy Policy. Specifically, the information and Personal Data that we collect may be transferred to, and stored at, a location outside of your jurisdiction. It may also be processed by staff operating outside of your jurisdiction who work for us or for one

of the organizations outlined in this Privacy Policy in connection with the activities outlined in this Privacy Policy. By submitting your information and Personal Data using the Sites, you agree to this transfer, storing or processing. We will take all steps necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy. We have put in place commercially reasonable technical and organizational procedures to safeguard the information and Personal Data we collect on the Sites.

The website may contain links to webpages operated by parties other than SocialDatabase. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to you to take precautions to ensure that whatever links you select (whether from this website or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which you will be subject to upon linking to the third party's website. SocialDatabase strongly recommends that you review the third party's terms and policies.

7. How long will you retain my data?

We use and keep Personal Data that we collect when we are the data controller no longer than necessary to fulfill the purpose for which it is being processed, to carry out legitimate business interests, as well as on the basis of applicable legal and contractual requirements (such as applicable statutes of limitation).

8. How do you protect my data?

We strive to maintain the highest standards of security and we have put in place robust administrative, physical, technical and organizational measures for the protection of your data in accordance with the current, general state of the art technologies, especially to protect the data against loss, falsification or access by unauthorized third persons. Once we have received your Personal Data we will use strict procedures and security features to prevent unauthorized access, undesired modification and/or disappearance of your personal data.

Although we take reasonable steps designed to protect your Personal Data, please be advised that no security system or means of transmitting data on the Internet can be guaranteed to be entirely secure (including without limitation with respect to computer viruses, malicious software and hacker attacks). We cannot and do not guarantee or warranty the security of your Personal Data or any information you disclose or transmit to us. We are not responsible for the acts of those who gain unauthorized access, and we make no warranty, express, implied or otherwise, that we will prevent such access, and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law. Where required under law, we will notify you of any such loss, misuse, or alteration of Personal Data that may affect you so that you can take the appropriate actions.

For your own privacy protection, we urge you to keep all passwords confidential. We also recommend that you do not include sensitive information such as passwords, Social Security numbers or payment information, in any emails that you send to us. If you become aware of any breach of the terms of this Privacy Policy, please notify us by email at privacy@socialdatabase.com.

9. What rights and choices do you have?

You may have certain rights relating to your Personal Information, subject to local data protection law. Whenever you use our services, we aim to provide you with choices about how we use your personal data. We also aim to provide you with access to your Personal Information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. Subject to applicable law, you may obtain a copy of Personal Information we maintain about you or you may update or correct inaccuracies in that information by contacting us. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that Personal Information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the “If you have questions” section below.

- **Rights Specific to European Union Residents**

The European Union’s General Data Protection Regulation (“GDPR”), and corresponding legislation in the United Kingdom and Switzerland, provide European, Switzerland and United Kingdom residents with certain rights in connection with Personal Data you have shared with us. If you are resident in the European Economic Area, you may have the following rights:

- **The right to be informed.** You are entitled to be informed of the use of your Personal Data. This Privacy Policy provides such information to you.
- **The right of access.** You have the right to request a copy of your Personal Data which we hold about you.
- **The right of correction:** You have the right to request correction or changes of your Personal Data if it is found to be inaccurate or out of date.
- **The right to be forgotten:** You have the right to request us, at any time, to delete your Personal Data from our servers and to erase your Personal Data when it is no longer necessary for us to retain such data. Note, however, that deletion of your Personal Data will likely impact your ability to use our services.
- **The right to object (opt-out):** You have the right to opt-out of certain uses of your Personal Data, such as direct marketing, at any time.
- **The right to data portability:** You have the right to a “portable” copy of your Personal Data that you have submitted to us. Generally, this means your right to request that we move, copy or transmit your Personal Data stored on our servers / IT environment to another service provider’s servers / IT environment.
- **The right to refuse to be subjected to automated decision making, including profiling:** You have the right not to be subject to a decision and insist on human intervention if the decision is based on automated processing and produces a legal effect or a similarly significant effect on you.
- **The right to lodge a complaint with a supervisory authority.**

You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

We may respond to your request by letter, email, telephone or any other suitable method. In some cases our ability to uphold these rights for you may depend upon our obligations to process Personal Data for security, safety, fraud prevention reasons, compliance with contractual, regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

- **Do Not Track and Direct Marketing**

SocialDatabase does not track its users over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, their website(s) and/or your browser may include controls to block and delete cookies, web beacons and similar technologies, to allow you to opt out of data collection through those technologies.

California residents are entitled to contact us to request information about whether we have disclosed Personal Data to third parties for the third parties' direct marketing purposes. Under the California "Shine the Light" law, California residents may opt-out of our disclosure of Personal Data to third parties for their direct marketing purposes. You may choose to opt-out of the sharing of your Personal Data with third parties for marketing purposes. To make such a request you should send (a) an email to privacy@socialdatabase.com with the subject heading "California Privacy Rights," or (b) a letter addressed to SocialDatabase, Inc., Attention: Privacy Policy Inquiry, 228 East 45th ST, Suite 9E, 10017, New York, NY. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California privacy rights requirements and only information on covered sharing will be included in our response. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

- **Our Opt-in/Opt-out Policy**

By providing an email address on the SocialDatabase website, you agree that we may contact you in the event of a change in this Privacy Policy, to provide you with any service-related notices, or to provide you with information about our events, promotions or related information.

For purposes of this Privacy Policy, "opt-in" is generally defined as any affirmative action by a user to submit or receive information, as the case may be.

We currently provide the following opt-out opportunities:

1. At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us to unsubscribe from the service.
2. At any time, you can contact us through privacy@socialdatabase.com or the address or telephone number provided below to unsubscribe from the service and opt-out from receiving any future communications from us.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service related notices.

10. Do we collect data from children?

The website is not designated or intended to be use by anyone under the age of 13. If you are under the age of 13 (or a minor in the jurisdiction in which you are accessing our website) do not post or submit any Personal Data to our website. We do not knowingly or intentionally gather Personal Data about children who are under the age of 13. If a child has provided us with Personal Data, a parent or guardian of that child may contact us to have the information from our records. If you believe that we may have any information from a child under the age of 13 in the application jurisdiction, please contact us at privacy@socialdatabase.com. If we learn that we inadvertently collected the Personal Data of a child under the age of 13, or equivalent minimum age depending on the jurisdiction, we will take steps to delete the information as soon as possible and cease the use of that information in accordance with applicable law.

11. Do we change our Privacy Policy?

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy notice changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain service or programs, email notification or privacy notice changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

We hope this Privacy Policy satisfies any queries you have about the way we process your data.

12. If you have questions

If you have any further concerns about how we process your data, you can get in touch with us at privacy@socialdatabase.com or with our data protection officer at dpo@socialdatabase.com. You can also contact us at:

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