

# PRIVACY POLICY

Effective date: 19 July 2019

We at SINAI know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. **By using or accessing the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.**

Remember that your use of SINAI's Services is at all times subject to the Terms of Use [<https://www.sinaitechnologies.com/legal>], which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use [<https://www.sinaitechnologies.com/legal>].

## **What does this Privacy Policy cover?**

This Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Services, but not to the practices of companies we don't own or control, or people that we don't manage. We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including to personalize, provide, and improve our services, to allow you to set up your account, to contact you and allow other users to contact you, to fulfill your requests for certain products and services, and to analyze how you use the Services. In certain cases, we may also share Personal Information with third parties, but only as described below.

As noted in the Terms of Use [<https://www.sinaitechnologies.com/legal>], we do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us with personal information, please contact us at [privacy@sinaitechnologies.com](mailto:privacy@sinaitechnologies.com)

## **Will SINAI ever change this Privacy Policy?**

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on <https://www.sinaitechnologies.com/legal>, by sending you an email, and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

## **What Information does SINAI Collect?**

### *Information You Provide to Us:*

We receive and store any information you knowingly provide to us. For example, we may receive or collect Personal Information such as your name, email address, job title, and Connected Account credentials (for example, your log-in credentials for Google or other third-party accounts that you use to sign in to the Services). If you provide your Connected Account credentials to us or otherwise sign in to the Services through a third-party site or service, you understand some content and/or information in those Connected Accounts (“Third-Party Account Information”) may be transmitted to us, and that Third-Party Account Information transmitted to our Services is covered by this Privacy Policy. Certain information may be required to register with us or to take advantage of some of our features.

We may communicate with you if you’ve provided us the means to do so. For example, if you’ve given us your email address, we may send you promotional email offers on behalf of other businesses, or email you about your use of the Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more interesting and improve our services. If you do not want to receive communications from us, please indicate your preference by using the “unsubscribe” link at the bottom of our emails.

### *Information Collected Automatically:*

Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, which may include your IP address, geolocation data, device identification, “cookie” information, the type of browser and/or device you’re using to access our Services, and the page or feature you requested. “Cookies” are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features.

If you click on a link to a third-party website or service, a third-party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren’t responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honor “Do Not Track” requests you have set using your browser or device.

We may use this data to customize content for you that we think you might like, based on your usage patterns. We may also use it to improve the Services – for example, this data can tell us how often users use a particular feature of the Services, and we can use that knowledge to make the Services interesting to as many users as possible.

## **Will SINAI Share Any of the Personal Information it Receives?**

We do not rent or sell your Personal Information in personally identifiable form to anyone. We may share your Personal Information with third parties as described in this section:

**Information that has been de-identified.** We may de-identify your Personal Information so that you are

not identified as an individual, and provide that information to our partners. We may also provide aggregate usage information to our partners (or allow partners to collect that information from you), who may use such information to understand how often and in what ways people use our Services, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage or de-identified information to a partner (or allow a partner to collect such information) in a manner that would identify you as an individual person.

**Affiliated Businesses:** In certain situations, businesses or third-party websites we're affiliated with may provide products or services to you through or in connection with the Services (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with affiliated business only to the extent that it is related to such transaction or service. We have no control over the policies and practices of third-party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies.

**Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you; for example, we may use an email delivery company to manage email communications with you. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us. Note that an "agent" may also be considered a "partner" in certain circumstances, and would be subject to the terms of the "**Information that's been de-identified**" section in that regard.

**User Profiles and Submissions:** Certain user profile information, including your name, location, and any video or image content relating to the Connected Account that you use in connection with the Services, may be displayed to other users to facilitate user interaction within the Services or address your request for our services. Please remember that any content you upload to your account, along with any Personal Information or content that you voluntarily disclose online in a manner other users can view (e.g. your name, etc.) becomes publicly available, and can be collected and used by anyone.

**Business Transfers:** We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third-party.

**Protection of SINAI and Others:** We reserve the right to access, read, preserve, and disclose any information that we believe is necessary to comply with law or court order; enforce or apply our Terms of Use [<https://www.sinaitechnologies.com/legal>] and other agreements; or protect the rights, property, or safety of SINAI, our employees, our users, or others.

### **Is Personal Information about me secure?**

Your account is protected by a password for your privacy and security. If you access the Services via a third-party site or service, you may have additional or different sign-on protections via that third-party site or service. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or another sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time.

## **What Personal Information can I access?**

Through your account settings, you may access, and, in some cases, edit or delete the following information you've provided to us:

- Name
- Email address
- Username
- Connected Account settings
- Preferred currency
- Preferred language
- Profile photo
- Phone number
- Work department
- Job title
- Country
- Location

The information you can view, update, and delete may also depend on the Connected Account you use and the permissions that you grant through your Connected Account and may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at [support@sinaitechnologies.com](mailto:support@sinaitechnologies.com)

California residents are entitled to ask us for a notice identifying the categories of Personal Information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third-parties. If you are a California resident and would like a copy of this notice, please submit a written request to [support@sinaitechnologies.com](mailto:support@sinaitechnologies.com)

## **What choices do I have?**

You can always opt not to disclose information to us, but keep in mind some information may be needed to take advantage of some of our features.

You may be able to add, update, or delete the information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. Some information may remain in our records after cease using the Services. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

## **What if I have questions about this policy?**

If you have any questions or concerns regarding our privacy policy, please send a detailed message to [privacy@sinaitechnologies.com](mailto:privacy@sinaitechnologies.com) and we will try to resolve your concerns.

## EU Residents

If you are a resident of the European Union (“EU”), the United Kingdom, Lichtenstein, Norway, or Iceland, you may have additional rights under the EU General Data Protection Regulation (the “GDPR”) with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage, and disclosure. If SINAI is not processing your Personal Data on behalf of a third-party, SINAI will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at [privacy@sinaitechnologies.com](mailto:privacy@sinaitechnologies.com)

<b>Category of Data</b>	<b>Source of Data (if not Data Subject)</b>	<b>Purpose of Processing</b>	<b>Grounds for Processing</b>	<b>Specific Legitimate Interests (if applicable)</b>	<b>Retention Period of Such Data</b>
Customer Contact Data (Name, Email Address, Phone Number)	Data Subject	To provide the Services to you.	Legitimate Interests	To protect the security of your account, to communicate with you about the Services, and to allow you to access the functionality of the Services.	As long as your account is considered to be active.
Customer Photo	Data Subject	To provide the Services to you.	Legitimate Interests	To facilitate interaction amongst platform users.	As long as your account is considered to be active.
Customer Job Data (Work Department, Job Title, Country, Location)	Data Subject	To provide the Services to you.	Legitimate Interests	To personalize the presentation of content to you while using the Services.	As long as your account is considered to be active.
Customer Presentation Preferences (Preferred Currency, Preferred Language)	Data Subject	To provide the Services to you.	Legitimate Interests	To personalize the presentation of content to you while using the Services.	As long as your account is considered to be active.

Device Information (operating system, web browser, etc.)	Data Subject	To provide the Services to you.	Legitimate Interests	To allow you to access the functionality of the Services.	As long as your account is considered to be active.
IP Address	Data Subject	To provide the Services to you (to suggest a presentation language, etc.)	Legitimate Interests	To allow you to access the functionality of the Services.	As long as your account is considered to be active.
Location Data	Data Subject	To provide the Services to you (to suggest a presentation language, currency, etc.)	Legitimate Interests	To allow you to access the functionality of the Services.	As long as your account is considered to be active.
Web Session Data	Data Subject	To provide the Services to you.	Legitimate Interests	To allow you to access the functionality of the Services.	As long as your account is considered to be active.

### How and With Whom Do We Share Your Data?

We share Personal Data with vendors, third-party service providers, and agents who work on our behalf and provide us with services related to the purposes described in this Privacy Policy or our Terms of Service. These parties include:

- Analytics service providers (e.g. Datadog)
- Messaging service providers (e.g. Mailgun)
- Staff augmentation and contract personnel
- Hosting service providers (e.g. Amazon Web Services)

We also share Personal Data when necessary to complete a transaction initiated or authorized by you or provide you with a product or service you have requested. In addition to those set forth above, these parties also include:

- Other users (eg. other users within your own company)
- Third-party business partners who you access through the Services
- Other parties authorized by you

We also share information with third parties when you have given us consent to do so (as indicated at the point such information is collected).

We also share Personal Data when we believe it is necessary to:

- Comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies
- Protect us, our business or our users, for example, to enforce our terms of service, prevent spam or other unwanted communications and investigate or protect against fraud
- Maintain the security of our products and services

Furthermore, if we choose to buy or sell assets, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that are transferred or acquired by a third-party, and we would share Personal Data with the party that is acquiring our assets. You acknowledge that such transfers may occur and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

### **How Long Do We Retain Your Personal Data?**

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you Services. In some cases, we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. Afterward, we retain some information in a depersonalized or aggregated form but not in a way that would identify you personally.

### **What Security Measures Do We Use?**

We seek to protect Personal Data using appropriate technical and organizational measures based on the type of Personal Data and applicable processing activity. For example, we use encryption when sending and storing Personal Data. We do not sell Personal Data to third parties, and only allow third-party access to Personal Data in order to improve the Services or for the purpose of analytics. We use SSL connections to manage the storage of Personal Data, and custom firewalls for additional protection of stored Personal Data.

### **What Rights Do You Have Regarding Your Personal Data?**

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email [privacy@sinaithechnologies.com](mailto:privacy@sinaithechnologies.com). Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data. You can also access certain of your Personal Data by logging into SINAI and viewing your account settings.<sup>1</sup>
- **Rectification:** If you believe that any Personal Data we hold about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by accessing your account settings. You can correct some of this information directly by logging into SINAI and editing your information from the account settings page.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use

or disclosure is necessary to enable you to utilize some or all of our Services.

- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about SINAI's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

**Children:** We request individuals under 16 not provide personal data to SINAI. If we learn that we have collected personal data from a child under 16, we will take steps to delete the information as soon as possible.

**Transfers of Personal Data:** The Services are hosted and operated in the United States ("U.S.") through SINAI and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third-party, is being provided to SINAI in the U.S. and will be hosted on U.S. servers, and you authorize SINAI to transfer, store and process your information to and in the U.S., and possibly other countries. You hereby consent to the transfer of your data to the U.S. pursuant to a data processing agreement incorporating standard data protection clauses promulgated by the European Commission, a copy of which can be obtained at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>.