

# **Privacy Policy**

Effective Date: September 1, 2018

At Commercial Analytics, LLC (hereinafter, "CA," "we," "our," or "us"), we take your privacy seriously and want you to understand how we use information and the ways in which you can protect your privacy. Our Privacy Policy explains the following:

- 1. What information we collect.
- 2. How we use and share the information we collect.
- 3. What choices are available to you regarding your information.
- 4. The security measures in place to protect your information.

Capitalized terms used but not defined in this Privacy Policy have the respective meanings given to them in our Terms of Service.

### **Information We Collect**

We collect information to operate our business effectively and to provide better Services to our Users. We collect information in the following ways:

- Information you provide us. We collect and have access to information that you voluntarily provide us via the Subscriber registration process, Contributor registration, data provided by our Contributors or other communication from you. Such information may include personal information such as your name, email, phone number, home address, and payment information, among other things.
- Information we get from your use of our Services. We may also use service providers to automatically track and collect certain types of non-personal information, such as a Subscriber's IP address, browser and/or system information, and http requests.

# How We Use and Share the Information We Collect

We use the information we collect to provide, maintain, protect, and improve the Services, to develop and provide new products and services, and to protect CA and our Users. We also use the information to communicate with you, for example, responding to your questions or requests and informing you about your account, security updates, any upcoming changes or improvements of the Services, and any new products and services that might be of interest to you.

We will not share your personal information (i.e., information that identifies you) with any third party outside of our organization unless one of the following circumstances applies:

- With your consent. We will share your personal information with parties outside of CA when we have your consent to do so. Except for the cases listed below, we require opt-in consent for the sharing of any sensitive personal information.
- With service providers. We may engage third-party service providers to perform certain functions and assist us in providing you with and improving the Services. They will have access to your personal information needed to perform their functions, and such access will be subject to their contractual obligations to keep the information confidential and secure.
- **For legal reasons.** We may share personal information with third parties if we have a good-faith belief that it is reasonably necessary to:
  - Meet any applicable law, regulation, legal process, or enforceable governmental request.
  - o Enforce our <u>Terms of Service</u>, including investigation of potential violations.
  - o Detect, prevent, or otherwise address fraud, security, or technical issues.
  - o Protect against harm to the rights, property, or safety of CA, our Users, or the public as required or permitted by law.
- **Business transfers**. If we buy, or are sold to, another entity, customer information generally is included in the transferred business assets but remains subject to the promises made in any preexisting privacy notice.

We may use and disclose aggregated, non-personal information in any manner, including Contributor data to develop our Services and to share it with third parties to analyze and understand general trends and usage statistics of our Services.

# **Your Access to and Control Over Information**

At CA, we strive to provide our Users with access to and control over their information. You may contact our customer service team at securedata@commercial-analytics.com to do the following:

- See what information we have about you, if any.
- Change and/or correct any information we have about you.
- Have us delete any information we have about you (subject to our rights to keep it to the extent necessary to comply with applicable law, to enforce our agreements with you, or protect ourselves or others).
- Express any concern you have about our use of your information.
- Opt out of future communications from us (but note that opting out of communications from us may mean we cannot provide the Services to you).

# Registration

In order to access and use our Subscriber Services, you must first complete the registration process to become a Subscriber. During registration, you are required to provide certain information (such as name, email, and address) to us.

# Security

We strive to protect your information by building our Site on reputable frameworks that have

comprehensive security measures in place to safeguard user information. We also strictly limit access to your information to authorized employees at CA and only share your information with third parties in accordance with this Privacy Policy.

Please understand that while we try our best to safeguard your information through the above measures, no Internet or email transmission is 100% secure or error free. It is important for you to protect against unauthorized access to your password and to your computer.

#### Cookies

We, and our service providers, reserve the right to use "cookies" or similar technologies on our Site and Apps. A cookie is a piece of data stored on a site visitor's hard drive to help improve such visitor's access to the site and identify repeat visitors to the site. Cookies provide the benefit of enhancing users' experience on a site. If we have cookies in use and you block or otherwise reject the cookies, the Services (or portions of them) may not function.

### **Do Not Track Notice**

Some browsers may give you "Do Not Track" settings to request that a website operator not track your browser information across its website or other websites. While we do not currently have the ability to honor the "Do Not Track" requests, we will only collect and use your information in accordance with this Privacy Policy.

# Stripe

We use a third-party payment processor, Stripe, Inc. ("**Stripe**"), to help facilitate and process payments Subscribers make through our Site or Apps. CA does not collect or store any financial information such as credit card numbers in connection with the processing of such payments. All such information will be provided by Subscribers directly to Stripe, and the collection, storing, and use of such information are subject to Stripe's privacy policy at https://stripe.com/us/privacy/.

# No Information from Children

Our Services are not intended for Users under eighteen (18) years of age, and we do not knowingly collect information from them. If you are under 18, please do not use or access our Services at any time or in any manner. We will take appropriate steps to delete any information of Users under 18 that has been collected on our Site or Apps upon learning of the existence of such information.

# Changes

Our Privacy Policy may change from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will notify you either by prominently posting a notice of such changes or by directly sending you a notification.

If at any time you feel that we are not abiding by this Privacy Policy, please <a href="mailto:securedata@commercial-data.com">securedata@commercial-data.com</a> immediately.