

# Social27

## Privacy Policy (Data Controller)

Last updated: September 13, 2020

### **SOCIAL27 Privacy Policy- Data Controller**

Social27 Inc. (“Social27”, “we”, “us” or “our”) is committed to protecting your privacy, as well as our clients and prospective clients (the “Client/s”), and other users of the [www.Social27.com](http://www.Social27.com) website (the “Site”) and services, and we want to ensure that you have a positive experience when you use our video conferencing and communication services (the “Services”), visit our Site webpages, interact with us on social media, or attend a Social27 sponsored event online or offline.

When we collect information that relates to an identified or identifiable individual (the “Personal Data” or “Personal Information”), we may be doing so one of two ways, (i) on our own behalf (in which case we will be considered a “controller” of your data), and (ii) your personal information, also referred to as the “Platform Content” may be collected on behalf of a Client who is using the Services through SOCIAL27’s Virtual Communication Platform, which includes services related to our Webinars, Virtual Environments, Channels, and Portals (collectively, the “Platform”) to organize an event and manage other event-related activities (in which case, the Client will be the “controller” and Social27 will be considered a “processor” of your Personal Information/Platform Content). The Personal Information we collect and how we use it varies depending upon the nature of our relationship, and whether Social27 is the data controller or data processor.

### **Controller and Responsible Party under GDPR**

For the purposes of the EU General Data Protection Regulation (the “GDPR”) and other relevant applicable laws SOCIAL27 is the controller of your personal information collected pursuant to this Policy. With respect to any Platform Data, our Clients are the data controllers or businesses for their respective Platform Data, and we are a data processor or service provider, as defined under applicable privacy laws.

If you are invited to, register for, check into, or receive information regarding a Client event through a Client Site or Service, you will be considered an “Event Attendee” and we will provide any Personal Information you submit through the Site or Service to the Client organizing that event via the Event Attendees, participants and other end users of the Platform and/or Client events the “Platform Data”. Social27 does not control the Client’s event registration or management process or determine the Platform Content that a Client requests from Event Attendees. When SOCIAL27 collects, submits, manages, creates, or records Platform Data via the Platform, or the Personal Information Social27 collects, accesses, stores, uses or otherwise processes (collectively, “process”) in order to provide our Services to Clients; we will only Process such Platform Data on behalf of the particular Client in order to provide our Services to that Client. As a processor, our collection, use, disclosure and other processing of Platform Data on behalf of Clients is subject to the privacy policy of our respective Clients. Please see the SOCIAL27 Platform Privacy for information about our processing of Platform Data. As set out in the SOCIAL27 Platform Privacy Policy, SOCIAL27 is a processor of the Platform Data; we only use the personal information that we Process as part of the Platform Data subject to our agreements with Clients and their written instructions, or where otherwise required by law. This Policy also does not apply to job applicants and candidates who apply for employment through our job application portal, or to employees and non-employee workers, whose personal information is subject to different privacy notices.

***Categories of Personal Information Collected.*** Social27 collects, or may collect, if requested by a Client, the following types of Personal Information:

- Identifiers: includes direct identifiers, such as name, account name, username, phone number, mailing address, email address, online identifier, Internet Protocol (“IP”) address, or other similar identifiers.
- Customer Records: includes Personal Information, such as name, signature, contact information, and payment information (e.g. credit cards), that individuals provide us to purchase or obtain our Services.
- Commercial Information: includes records, or Services purchased, obtained or considered, or other purchasing or use histories.
- Usage Data: includes browsing history, clickstream data, search history, access logs and other usage data and information regarding an individual’s interaction with our Site and Services, and our marketing emails and online ads.

- Geolocation Data: includes precise location information about a particular individual or device.
- Audio, Video and Electronic Data: includes audio, electronic, visual, or similar information, and call recordings.
- Professional Information: includes professional and employment-related information, such as current and former employer(s) and position(s) and business contact information.
- Protected Classifications: includes characteristics of protected classifications under applicable laws, such as disability information and medical conditions provided by you when you register for events and other activities.
- Inferences: includes inferences drawn from other Personal Information that we collect to create a profile reflecting an individual user' preferences, behavior or other characteristics. For example, we may analyze Personal Information in order to identify the offers and information that may be most relevant to our Clients, so that we can better reach them with relevant ads and offers.

***Use of Personal Information.*** In general, Social27 may use and disclose the Personal Information we collect for the following business and commercial purposes:

- Operating Site and Services and providing related support
- Responding to user and Client inquiries and fulfilling requests
- Analyzing and improving the Site, our Services, and our business
- To provide you with technical and administrative information relating to our Sites and Services, such as security notices, Service-related status reports, and changes to our policies or Terms of Use. Please note that these communications are considered part of our Services and you may not opt out of them.
- Personalizing user experiences
- To send you updates, newsletters and other content that you have requested or subscribed to, as well as informational materials regarding our Services.
- If you have consented, and it is in compliance with applicable laws, we may send you marketing communications regarding products and services that we believe may be of interest to you. If you later decide that you no longer want to receive this type of promotional information, you may opt-out at any time by clicking the “Unsubscribe” button at the bottom of the marketing

communication or contacting us at the email or mailing address provided in the “Contact Information” section of this Privacy Policy.

- Protecting our legal rights and preventing misuse
- Complying with legal obligations
- Related to our general business operations

If you are a California resident, please be sure to review the section “Additional Information for Individuals in Certain Jurisdictions” below for important information about our privacy practices and your rights under California privacy laws, including your right to submit a “Do Not Sell My Info” request.

### **Personal Information Not Required-Limited Use**

The Personal Information that Social27 collects and processes will vary depending upon the circumstances. You do not have to provide us with your Personal Information to access certain sections of the Site. If you choose not to disclose certain Personal Information, you can still visit our Site, but you will not be able to create an account with us, and you may not be able to access certain options and services, and we may be unable to fully respond to your inquiries.

***Personal Information Collected Directly***. We may collect personal information about you *directly* from you or from the Client. For example, when you fill out a ‘Contact Us’ form, sign up for our mailing lists, or register for events we host or sponsor, or otherwise provide us information through the Site, we may collect Personal Information such as:

- Name, company name, and title/position
- Payment and billing information
- Email address, phone number, mailing address and contact details
- Job title, other company information (such as country and industry sector)
- Contact preferences and interests
- Business affiliations
- Customer (and authorized user) account information (to access various parts of the Platform, and to create events and webinars) – name, email address, telephone number, company name, and other information necessary to confirm that you are an authorized user of a Client (where relevant)
- Other information related to your request or inquiry

### ***Personal Information Collected Indirectly***

***Automatically-Collected Personal Information.*** We use cookies, log files, pixel tags, local storage objects, and other tracking technologies to automatically collect information when users access or use the services or visit the Site, such as IP address, general location information, domain name, page views, a date/time stamp, browser type, device type, device ID, Internet service provider, referring/exit URLs, operating system, language, clickstream data, and other information about the links clicked, features used, size of files uploaded, streamed or deleted, and similar device and usage information. For more information, see the *Cookies and Similar Devices* section below.

***Personal Information Collected from Third Parties.*** We may collect personal information about you from third party sources, such as business partners, social media platforms, public sources, joint marketing partners (so that we can deliver our Platform and related services) and third parties to whom you have expressed interest in our products and services, as well as information that you shared on social media platforms (subject to the respective Platform terms and applicable laws).

## **Purposes and Legal Bases of Personal Information Use**

***Personal Information Purpose.*** The purposes for which we may process personal information will vary depending upon the circumstances. In general, we use Personal Information for the business and commercial purposes set forth below, and where the GDPR or other relevant laws apply, we have set forth the legal bases for such processing *in parenthesis* (see above for further explanation of our legal bases):

- Operating Site and services and providing related support: to provide and operate the Site and services, communicate with you about your use of the Site and our services, provide troubleshooting and technical support, respond to your inquiries, fulfill your orders and requests, process your payments, communicate with you, and for similar service and support purposes. (*Legal bases: performance of our contract with you; and/or our legitimate interests*)
- Responding to requests: to respond to your inquiries and requests and consider your request or application. (*Legal basis: performance of our contract with you*)

- Analyzing and improving the Site, our services, and our business: to better understand how users access and use the Site and our services, as well as other products and offerings, both on an aggregated and individualized basis, to administer, monitor, and improve our Services, for our internal purposes, and for other research and analytical purposes. *(Legal basis: our legitimate interests)*
- Personalizing experiences: to tailor content we may send or display on the Site, including to offer location customization and personalized help and instructions, and to otherwise personalize your experiences. *(Legal basis: our legitimate interests)*
- Advertising and marketing: to promote SOCIAL27's products and Services on third-party websites, as well as for direct marketing purposes, including to send you communications, Client alerts and information we think may interest you. If you are located in a jurisdiction that requires opt-in consent to receive electronic marketing messages, we will only send you such messages if you opt-in to receive them. *(Legal bases: our legitimate interests; and/or with your consent)*
- Protecting our legal rights and preventing misuse: to protect the Site and our business operations; to prevent, detect and investigate fraud, misuse, harassment or other types of unlawful activities; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party, or violations of this Policy and our applicable Terms of Use and agreements. *(Legal bases: our legitimate interests; and/or compliance with laws)*
- Complying with legal obligations: to comply with the law or legal proceedings. For example, we may disclose information in response to subpoenas, court order, and other lawful requests by regulators and law enforcement, including responding to national security or law enforcement disclosure requirements. *(Legal bases: our legitimate interests; and/or compliance with laws)*
- Related to our general business operations: to consider and implement mergers, acquisitions, reorganizations, and other business transactions, and where necessary to the administration of our general business, accounting, recordkeeping and legal functions. *(Legal bases: our legitimate interests; and/or compliance with laws)*

***Aggregate, De-identified or Anonymous Data.*** We also create and use aggregate, anonymous and de-identified data to assess, improve and develop our business, products and Services, and for similar research and analytics purposes. This information is not generally subject to the restrictions in this Policy, provided it does not identify and could not be used to identify a particular individual.

## **Disclosures of Personal Information**

In general, we disclose the Personal Information we collect for the business and commercial purposes explained below:

- Enterprise users: if you use, access or communicate with us about our Platform or related services on behalf of your company (our Client), we may share Personal Information about your access, and your communications or requests, with the relevant enterprise Client.
- Service providers: to third party service providers who perform functions on our behalf. Third party service providers will only process your Personal Information in accordance with our instructions and will implement adequate security measures to protect your personal information.
- Advertising and analytics partners: to third parties we engage to provide advertising, campaign measurement, online and mobile analytics, and related services to us (with your consent, where required by applicable laws).
- In response to legal process: in order to comply with the law, judicial proceedings, a court order, or other legal process, such as in response to a subpoena.
- To protect our rights: where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of the SOCIAL27 Terms of Use or this Privacy Policy, to respond to claims asserted against us or, or as evidence in litigation in which we are involved.
- Business transfers: as part of any merger, sale, and transfer of our assets, acquisition or restructuring of all or part of our business, bankruptcy, or similar event, including related to due diligence conducted prior to such event where permitted by law.

***Aggregate, De-identified or Anonymous data.*** We may share aggregate, anonymous or de-identified data with third parties for research, marketing,

analytics and other purposes, provided such information does not identify a particular individual.

### **Cookies and Similar Devices**

We and our third party service providers use “cookies,” pixels, java script, log files, and other mechanisms on the Site. For more detailed information about the use of cookies on the Site and how you can manage your cookie preferences, you can review our Cookie Policy found [here](#).

**Cookies.** A “cookie” is a small text file that may be used, for example, to collect information about website activity. Some cookies allow us to make it easier for you to navigate the Site, while others are used to enable a faster log-in process or to allow us to track your activities while using the Site. Most browsers allow you to control cookies, including whether or not to accept them, and how to remove them. See our [Cookie Policy](#) for more information.

**Clear GIFs, Pixel Tags and Other Technologies.** Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer’s hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (also referred to as web beacons, web bugs or pixel tags), in connection with our services to, among other things, track the user activities of our Services, help us manage content, and compile statistics about usage of our Services. We and our third party service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

**Log Files.** Most browsers collect certain information, such as your IP address, device type, screen resolution, operating system version, and internet browser type and version. This information is gathered automatically and stored in log files.

**Third-Party Analytics.** We also use automated devices and applications to evaluate use of our Services. We use these tools to gather non-personal information about users to help us improve our Site and services, as well as user experiences. These analytics providers may use cookies and other technologies to perform their services and may combine the information they collect about you on the Site with other information they have collected for their own purposes. This Policy does not cover such uses of data by third parties.

***Do-Not-Track Signals.*** The Site does not respond to do-not-track signals. You may, however, disable certain tracking as discussed above (e.g., by disabling cookies) and set out in our [Cookie Policy](#).

### **International Transfers**

SOCIAL27 is headquartered in the United States and has operations and service providers in the United States and throughout the world. As such, we and our service providers may transfer your personal information to, or access it in, jurisdictions (including but not limited to the United States, and the European Union (“EU”)), that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it, including through appropriate written data processing terms and/or data transfer agreements.

If you are in the European Economic Area (“EEA”), and we process your Personal Information in a jurisdiction that the European Commission has deemed to not provide an adequate level of data protection (a “third country”), we will implement measures to adequately protect your Personal Information, such as putting in place standard contractual clauses approved by the European Commission or another measure that has been approved by the EU Commission as adducing adequate safeguards for the protection of Personal Information when transferred to a third country. You have a right to obtain details of the mechanism under which your Personal Information is transferred outside of the EEA; you may request such details by contacting us as set forth in the *Contact Us* section below.

### **Protection of Children’s Personal Information**

SOCIAL27 does not publish content that is targeted at children. The Site is not intended for minors under the age 16. We do not knowingly or specifically collect information about minors under the age of 16. If you believe we have unintentionally collected such information, please notify us as set out in the *Contact Us* section below.

### **Security**

Wherever your Personal Information may be held within SOCIAL27 or on its behalf, we take reasonable steps to protect the Personal Information that you share with

us from unauthorized access or disclosure, including, without limitation, restricting access to certain portions of our Site through access controls, and using firewalls. Regardless of the precautions taken by us, SOCIAL27 cannot ensure or warrant the security of any information you transmit to us, and you transmit such information at your own risk. You are responsible for all actions taken with your User ID and password, if any. Therefore, we recommend that you do not disclose your password to anyone. If you lose control of your password, you may lose substantial control over your Personal Information and may be subject to legally binding actions taken on your behalf.

### **Your Choices and Rights**

***Access, Amend and Correct.*** If you wish to access Personal Information that you have submitted to us, to request the correction of any inaccurate information you have submitted to us, or to request deletion of your information, please send your request to [privacy@Social27.com](mailto:privacy@Social27.com). We will review your request and make reasonable efforts to respond to it as soon as practicable. We may ask you for additional information so that we can confirm your identity.

***Direct Marketing.*** You may always opt-out of direct marketing emails. If you would like to unsubscribe from SOCIAL27 email subscriptions or otherwise change your email preferences with SOCIAL27, please click [here](#) or follow the instructions in any SOCIAL27 promotional email that we send to you. We may continue to send you transactional or service-related communications, such as service announcements and administrative messages.

***Complaints.*** We will take steps to try to resolve any complaint you raise regarding our treatment of your Personal Information. You also have the right to raise a complaint with the privacy regulator in your jurisdiction.

***Additional Information for Certain Jurisdictions.*** In the section “Additional Information for Individuals in Certain Jurisdictions” below, we provide additional information as required under California privacy laws, as well as the GDPR. Users in California and the EEA should review this section for more information regarding their rights under these respective laws.

### **Retention**

As a general rule, we retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected or as necessary to comply with our legal obligations, resolve disputes, maintain appropriate business records, and enforce our agreements. In general, for example, we will retain relevant contact information of Clients, prospective Clients and Site visitors for three years from the date of our last interaction with you and in compliance with our obligations under applicable laws. Our Clients instruct us on how long to retain Platform Data, which we handle as a data processor. We may retain Personal Information for longer where required by our regulatory obligations, professional indemnity obligations, or where we believe necessary to establish, defend, or protect our legal rights and interests or those of others.

### **Changes to the Policy**

SOCIAL27 may update this Policy to reflect new or different privacy practices or to reflect changes in industry standards or legal requirements. Revisions will be posted on our Site. This statement of privacy is for the information of our users and does not constitute a contract or modification of any contract. When changes are made to this Privacy Policy, SOCIAL27 will post a new version of this Privacy Policy [here](#). If the changes will materially affect the way we use or disclose your Personal Information, we will endeavor to notify you in advance of the change, such as by sending a notice to the primary email address associated with your account or by posting a notice on the Site. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices.

### **Contact Us**

SOCIAL27 welcomes your comments regarding this Privacy Policy. Please feel free to contact us at:

Social27 Inc.

Attn: Ike Kehal

2733, 152 ND AVE NE

Redmond, WA, 98052

Phone:1.800.720.4851

Email: [privacy@social27.com](mailto:privacy@social27.com)

***EU Representative.*** Individuals in the EU may also contact us through our office at:

Klimentská 46

Prague 1 110 02

Czech Republic

## **Additional Information for Individuals in California and Europe**

### ***California Residents***

In this section, we provide additional information for California residents about how we handle their Personal Information, as required under California privacy laws, including the California Consumer Privacy Act (“**CCPA**”). This section does not address or apply to our handling of publicly available information lawfully made available by state or federal government records or other personal information that is exempt under the CCPA.

#### **1. Categories of Personal Information Under the CCPA**

While our collection, use and disclosure of Personal Information varies based upon our relationship and interactions with you, in this section we describe, generally, how we have collected and disclosed Personal Information about consumers in the prior 12 months.

***Categories of Personal Information Collected and Disclosed.*** The table below identifies the categories of personal information (as defined by the CCPA) we have collected about consumers, as well as how we have disclosed such information for a business purpose. For more information about the business and commercial purposes for which we collect, use and disclose personal information, please see the [Purposes and Legal Bases](#) and the [Disclosures of Personal Information](#) sections above.

***Do We “Sell” Personal Information?*** Under the CCPA, a “sale” includes disclosing or making available Personal Information to a third-party in exchange for monetary

compensation or other benefits or value. We do not disclose Personal Information to third parties in exchange for monetary compensation.

**Sources of Personal Information.** As further described in the “Information We Collect” section above, we may collect Personal Information from the following sources:

- Our enterprise customers
- Directly from the individual
- Advertising networks
- Data analytics providers
- Social networks
- Internet service providers
- Operating systems and platforms
- Publicly available sources

## **B. California Residents’ Rights**

**CCPA Rights.** In general, California residents have the following rights with respect to their personal information:

- Do-not-sell (opt-out): to opt-out of our sale of their personal information. While we may “sell” personal information as defined by the CCPA, we do not sell personal information about California consumers who we know are younger than 16 years old. California residents may opt out of sales of their personal information by us, by contacting Social27 using the contact information in the Contact Us section.
- Right of deletion: to request deletion of their Personal Information that we have collected about them and to have such Personal Information deleted (without charge), subject to certain exceptions.
- Right to know: with respect to the Personal Information we have collected about them in the prior 12 months, to require that we disclose the following to them (up to twice per year and subject to certain exemptions):
  - categories of Personal Information collected;
  - categories of sources of Personal Information;
  - categories of Personal Information about them we have disclosed for a business purpose or sold;

- categories of third parties to whom we have sold or disclosed for a business purpose their Personal Information;
- the business or commercial purposes for collecting or selling their Personal Information; and
- a copy of the specific pieces of Personal Information we have collected about them.
- Right to non-discrimination: the right not to be subject to discriminatory treatment for exercising their rights under the CCPA.

***Submitting Verifiable Requests.*** Requests to Know and Requests to Delete may be submitted:

- By email at [privacy@Social27.com](mailto:privacy@Social27.com)

When you submit a request to know or a request to delete, we will take steps to verify your request by matching the information provided by you with the information we have in our records. You must complete all required fields on our webform (or otherwise provide us with this information via the above toll-free number) and verify your email address. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor. Authorized agents may initiate a request on behalf of another individual by contacting us as set forth in the Contact Us section above; authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

**For more information about our privacy practices, you may contact us as set forth in the *Contact Us* section above.**

### ***Individuals in the European Union / European Economic Area***

Below, we inform about other rights, including the GDPR and similar applicable laws, that may apply to you. Subject to the conditions set out in the applicable law, individuals in in the EU/EEA have the following rights with regards to our processing of their personal information:

- Right of access: You can ask us to: confirm whether we are processing your Personal Information; give you a copy of that information; provide you with

other information about your Personal Information such as what data we have, what we use it for, who we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your information from and whether we have carried out any profiling, to the extent that such information has not already been provided to you in this Policy.

- Right to rectify and complete Personal Information: You can ask us to rectify inaccurate information. We may seek to verify the accuracy of the Personal Information before rectifying it.
- Right of erasure: You can ask us to erase your Personal Information, but only where it is no longer needed for the purposes for which it was collected; you have withdrawn your consent (where the data processing was based on consent); following a successful right to object (see 'Objection' below); it has been processed unlawfully; or to comply with a legal obligation to which we are subject. We are not required to comply with your request to erase your Personal Information if the processing of your Personal Information is necessary: for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims. There are certain other circumstances in which we are not required to comply with your erasure request, although these two are the most likely circumstances in which we would deny that request.
- Right of restriction: You can ask us to restrict your Personal Information, but only where: its accuracy is contested, to allow us to verify its accuracy; the processing is unlawful, but you do not want it erased; it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; you have exercised the right to object, and verification of overriding grounds is pending. We can continue to use your personal information following a request for restriction, where: we have your consent; to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.
- Right to object to our use of your Personal Information for direct marketing purposes: You can request that we change the manner in which we contact you for marketing purposes. You can request that we not transfer your Personal Information to unaffiliated third parties for the purposes of direct marketing or any other purposes.
- Right to object for other purposes: You have the right to object at any time to any processing of your Personal Information which has our legitimate

interests as its legal basis. You may exercise this right without incurring any costs. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms. The right to object does not exist, in particular, if the processing of your personal information is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

- Right not to be subject to automated decision-making: You have the right not to be subject to a decision when it is based on automatic processing if it produces a legal effect or similarly significantly affects you, unless it is necessary for entering into or performing a contract between us.
- Right to (data) portability: You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it ‘ported’ directly to another data controller, but only where our processing is based on your consent and the processing is carried out by automated means.
- Right to withdraw consent: You can withdraw your consent in respect of any processing of Personal Information which is based upon a consent which you have previously provided.
- Right to obtain a copy of safeguards: You can ask to obtain a copy of, or reference to, the safeguards under which your Personal Information is transferred outside the EU/EEA. We may redact data transfer agreements to protect commercial terms.
- Right to lodge a complaint with your local supervisory authority: You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your Personal Information. We ask that you please attempt to resolve any issue with us first, although you have a right to contact your supervisory authority at any time.

**Submitting a GDPR.** Please contact us as set out in the *Contact Us* section above to exercise one of these rights. If we receive any requests from individuals related to the Platform Data, we will forward the request to the relevant Clients to address.