

# PredPol Privacy Policy

Privacy Statement, effective as of June 5, 2018

This Predpol Privacy Statement ("Privacy Statement") describes our privacy practices. Please read this Privacy Statement carefully to learn how we collect, use, share and otherwise process information relating to individuals ("Personal Data"), and your rights and choices regarding our processing of your Personal Data.

A reference to "Predpol," "we," "us," "our," or the "Company" is a reference to Predpol, Inc.

## 1. Processing activities covered

This Privacy Statement applies to the following processing activities:

- Visiting our website where you request to schedule a demo, signup for a newsletter, download a white paper, signup for news updates or request a quote ("Website");
- Logging into our PredPol platform for predictive services ("Predictive Services");
- Receiving communications from us, including emails, texts or fax.

Our Website may contain links to other websites, applications and services maintained by third parties. The information practices of such other services are governed by the third-party privacy statements, which we encourage you to review to better understand those third parties' privacy practices.

## 2. Responsible Predpol entity

Predpol is the controller of your Personal Data and responsible for the collection, processing and disclosure of your Personal Data as described in this Privacy Statement, unless expressly specified otherwise.

## 3. What Personal Data do we collect?

### 3.1 Personal Data we collect directly from you

The Personal Data that we collect directly from you may include the following:

- if you express an interest in obtaining additional information about our services, request to schedule a demo, signup for a newsletter, download a white paper, signup for news updates, request a quote, request customer support through our Predictive Platform, we generally require you to provide us with your contact information, such as your name, job title, company name, address, phone number and email address;
- if you use and interact with our Website, we automatically collect log files and other information about your device and your usage of our Website through cookies, web beacons or similar technologies, such as IP-addresses or other identifiers, which may qualify as Personal Data (view the "What device and usage data we process" section below);

### 3.2 Personal Data we collect from other sources

We may also collect information about you from other sources, including third parties from whom we have purchased Personal Data (limited to email addresses, name, title, and agency or employer), and combine this information with Personal Data provided by you. This helps us to update, expand and analyze our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you. In particular, we collect Personal Data from the following sources:

- Business contact information, including mailing address, job title, email address, phone number, 'intent data' which includes web user behavior data, social media identifiers, and custom profiles from third party data providers for the purposes of targeted advertising, delivering relevant email content, tradeshow attendance and targeting for marketing purposes.

## 4. What device and usage data we process

We use common information-gathering tools, such as log files, cookies, web beacons and similar technologies to automatically collect information, which may contain Personal Data, from your computer or mobile device as you navigate our Website, Predictive Platform or interact with emails we have sent you.

### 4.1 Log Files

As is true of most websites, we gather certain information automatically via log files. This collected information may include your Internet Protocol (IP) address (or proxy server), device and application identification numbers, your location, your browser type, your

Internet service provider and/or mobile carrier, the pages and files you viewed on our site, the search terms you used to reach our site, your operating system and system configuration information, and date/time stamps associated with your usage. This information is used to analyze overall usage trends, to help us provide and improve our Website and Predictive Platform, and to guarantee their security and continued proper functioning. We may also collect IP addresses from users when they log into the services as part of the Company's security features.

#### 4.2 Cookies, web beacons and other tracking technologies

We use cookies and similar technologies such as web beacons, tags and Javascript alone or in conjunction with cookies to compile information about usage of our Website, Predictive Platform and interaction with emails from us.

When you visit our Website or our Predictive Platform, our servers or an authorized third party may place a cookie on your browser, which can collect information, including Personal Data, about your online activities over time on our site. Cookies allow us to track overall usage, determine areas that you prefer, make your usage easier by recognizing you and providing you with a customized experience.

We use both session-based and persistent cookies. Session cookies exist only during one session and disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer or device after you close your browser or turn off your computer. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Website or services. To opt-out from tracking by Google Analytics, please use the specific opt-out mechanism as indicated further below.

We also use web beacons on our Website and our Predictive Platform. For example, we may place web beacons in marketing emails that notify us when you click on a link in the email that directs you to one of our Website. In the case of our Predictive Platform, if you receive daily predictions via email, we are notified when you open the email. Such tracking technologies are used to operate and improve our Website, Predictive Platform and email communications and track the clicking of links or opening of emails.

The following sets out how we use different categories of cookies and similar technologies, as well as information on your options for managing the settings for the data collection by these technologies:

Type of Cookies	Description	Managing Settings
Required cookies	<p>Required cookies enable you to navigate our Website and use their features, such as accessing secure areas of the Website.</p> <p>If you have chosen to identify yourself to us, we may place on your browser a cookie that allows us to uniquely identify you when you are logged into the Website.</p>	<p>Because required cookies are essential to operate the Website there is no option to opt out of these cookies.</p>
Functional cookies	<p>Functional cookies allow us to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features.</p> <p>Functional cookies may also be used to improve how our Website function and to help us provide you with more relevant messages, including marketing communications. These cookies collect information about how our Website is used, including which pages are viewed most often.</p> <p>We may use our own technology or third party technology to track and analyze usage and volume statistical information to provide enhanced interactions and more relevant communications, and to track the performance of our advertisements.</p> <p>In particular, we use Google Analytics ("Google Analytics"), a web analytics service provided by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA as our processor. Google Analytics uses cookies to help us analyze how our Website is used, including the number of visitors, the websites visitors have come from, and the pages they visit. This information is used by us to improve our Website.</p> <p>Predpol may also utilize HTML5 local storage or Flash cookies for these purposes. Flash cookies and HTML local storage are different from browser cookies because of the amount of, type of, and how data is stored.</p> <p>We also use technologies provided by Footprintlive.com to anonymously track visits to our site and pages viewed when visiting our site.</p>	<p>To manage the use of functional cookies on our Website, consult your individual browser settings for cookies. Note that opting out may impact the functionality you receive when using our Website.</p> <p>To opt out from data collection by Google Analytics, you can download and install a browser add-on, which is available <a href="#">here</a>.</p> <p>To learn how to control functional cookies using your browser settings <a href="#">click here</a>.</p> <p>To learn how to manage privacy and storage settings for Flash cookies <a href="#">click here</a>.</p>

#### 4.3 Opt-Out from the collection of device and usage data

You may opt-out from the collection of device and usage data (see "What device and usage data we process" section above) by managing your cookies at the individual browser level.

#### 4.4 Social Media Features

Our Website may use social media features, such as the Facebook "like" button, the "Tweet" button and other sharing widgets ("Social Media Features"). You may be given the option by such Social Media Features to post information about your activities on a website to a profile page of yours that is provided by a third party social media network in order to share with others within your network. Social Media Features are either hosted by the respective social media network or hosted directly on our Website. To the extent the Social Media Features are hosted by the respective social media networks, the latter may receive information that you have visited our Website from your IP address. If you are logged into your social media account, it is possible that the respective social media network can link your visit of our Website with your social media profile.

Your interactions with Social Media Features are governed by the privacy policies of the companies providing the relevant Social Media Features.

#### 4.6 Automatic Vehicle Location ("AVL/GPS") log information

For our Predictive Platform, if your agency has implemented AVL/GPS features, we may also collect GPS log information (like "bread crumb" trail, time spent in a PredPol box, duration of calls), device event information (such as crashes, system activity, hardware settings, browser language), and location information (through IP address, GPS, and other sensors).

### 5. Purposes for which we process Personal Data and the legal basis on which we rely

We collect, process your Personal Data for the purposes and on the legal bases identified in the following:

- Providing our Predictive Platform: We will process your Personal Data to the extent this is necessary for the performance of our contract with your agency for the use of our Predictive Platform and to fulfill our obligations under the applicable terms of use/service. Where we have not entered into a contract with you, we base the processing of your Personal Data on our legitimate interest to operate and administer

our Website and to provide you with content you access and request (e.g., request for a demo and download of a white paper);

- Promoting security of our Predictive Platform: We will process your Personal Data by tracking the use of our Predictive Platform, creating aggregated, non-personal data, verifying accounts and activity, investigating suspicious activity, as well as violations of and enforcement of our terms and policies, to the extent this is necessary for the purpose of our legitimate interests in promoting the safety and security of the systems and application used for our Predictive Platform, and protecting our rights and the rights of others;
- Managing user registrations: We will process your Personal Data by managing your user account for the purpose of performing the contract with your agency according to any applicable terms of service;
- Handling contact and user support requests: If you fill out a "Contact Me" web form, request user support, or if you contact us by other means, we will process your Personal Data for the performance of our contract with you and to the extent it is necessary for the purpose of our legitimate interests to fulfill your request and communicate with you;
- Sending marketing communications: We will process your Personal Data to send you marketing information, product recommendations and other non-transactional communications (e.g., marketing newsletters and white papers) about us and our affiliates and partners, including information about our products, promotions or events as necessary for our legitimate interests to conduct direct marketing or to the extent you have provided your prior separate consent (please also view "Your rights relating to your Personal Data" section below to learn how you can control how your Personal Data is processed by Predpol for marketing purposes);
- Complying with legal obligations: We will process your Personal Data when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Data to protect our rights, and is necessary for our legitimate interests to protect against misuse or abuse of our Predictive Platform, to protect personal property or safety, to pursue remedies available to us and limit our damages, to comply with a judicial proceedings, court order or legal process, and/or to respond to lawful requests.

Where we need to collect and process Personal Data by law, or under a contract we have entered into with your agency and you fail to provide that required Personal Data when requested, we may not be able to perform the contract.

## 6. Who do we share Personal Data with?

We may share your Personal Data with the following recipients:

- Our contracted service providers which provide services such as hosting and marketing; such service providers comprise companies located in the countries in which we operate;
- With third-party social networks, advertising networks and websites, which usually act as separate controllers, so that Predpol can market and advertise on third party platforms and websites;
- If we are involved in a merger or reorganization, or if all or a portion of our business, assets or stock are acquired by another company, we may transfer some or all of your Personal Data to such third party. In accordance with applicable laws, we will use reasonable efforts to notify you of any such transfer of Personal Data to an unaffiliated third party as processing of your Personal Data will be required for the purposes set out in "Purposes for which we process Personal Data and on which legal bases" section above.
- Any Personal Data or other information you choose to submit in communities, forums, blogs, or chat rooms on our Website may be read, collected, and/or used by others who visit these forums, depending on your account settings.

## 7. International transfer of information collected

Your Personal Data may be collected, transferred to and stored by us in the United States and by our affiliates in other countries where we operate.

Therefore, your Personal Data may be processed outside the EEA, and in countries which are not subject to an adequacy decision by the European Commission and which may not provide for the same level of data protection in the EEA. In this event, we will ensure that such recipient offers an adequate level of protection, for instance by entering into standard contractual clauses for the transfer of data as approved by the European Commission (Art. 46 GDPR), or we will ask you for your prior consent to such international data transfers.

## 8. Children

Our Website and Predicative Platform are not directed at nor intended to be used by children. We do not knowingly collect Personal Data from children under the age of 16. If you are a parent or guardian and believe your child has provided us with Personal Data without your consent, please contact us as described in the “Contacting Us” section below and we will take steps to delete such Personal Data from our systems.

## 9. How long do we keep your Personal Data?

We may retain your Personal Data for a period of time consistent with the original purpose of collection (see "Purposes for which we process Personal Data and on what legal basis" section above). We determine the appropriate retention period for Personal Data on the basis of the amount, nature, and sensitivity of your Personal Data, the potential risk of harm from unauthorized use or disclosure, and whether we can achieve the purposes of the processing through other means, as well as the applicable legal requirements (such as applicable statutes of limitation).

After expiry of the retention periods, your Personal Data will be deleted. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further use of the data.

## 10. Your rights relating to your Personal Data

### 10.1 Your rights

You have certain rights regarding your Personal Data, subject to local data protection laws. These may include the following rights:

- to access your Personal Data held by us (right to access);
- to rectify inaccurate Personal Data and ensure it is complete (right to rectification);
- to erase/delete your Personal Data to the extent permitted by other legal obligations (right to erasure; right to be forgotten);
- to restrict our processing of your Personal Data (right to restriction of processing);
- to transfer your Personal Data to another controller to the extent possible (right to data portability);



- to object to any processing of your Personal Data carried out on the basis of our legitimate interests (right to object). Where we process your Personal Data for direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection;
- not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making"); Automated Decision-Making currently does not take place on our Website;
- to the extent we base the collection, processing and sharing of your Personal Data on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal.

## 10.2 How to exercise your rights

To exercise your rights, please contact us in accordance with the "[Contacting Us](#)" section below. We try to respond to all legitimate requests within one month and will contact you if we need additional information from you in order to honor your request. Occasionally it may take us longer than a month, taking into account the complexity and number of requests we receive. If you are an employee of a Predpol customer, we recommend you contact your agency's administrator for assistance in correcting or updating your information.

In addition, if you have a registered user login with us, you may generally update your user settings, or profile by logging into the applicable website with your username and password and editing your settings or profile. To request return or deletion of your Personal Data and other information associated with your account, please contact us.

## 10.3 Your rights relating to Customer Data

As described above, we may also process Personal Data in the role of a processor (see "Responsible Predpol entity" section above). If your data has been submitted to us by a Predpol customer and you wish to exercise any rights you may have under applicable data protection laws, please inquire with your agency directly. If you wish to make your request directly to us, please provide the name of the Predpol customer who submitted your data when you contact us. We will refer your request to that customer, and will support them as needed in responding to your request within a reasonable timeframe.

## 10.4 Your preferences for marketing communications

If we process your Personal Data for the purpose of sending you marketing communications, you may manage your receipt of marketing and non-transactional

communications from us by clicking on the “unsubscribe” link located on the bottom of our marketing emails. Additionally, you may contact us using the information in the “Contacting Us” section below. Please note that opting-out of marketing communications does not opt you out of receiving important business communications related to your current relationship with us, such as information about your subscriptions, service announcements or security information.

## 11. Security

We take precautions including organizational, technical, and physical measures, to help safeguard against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, the Personal Data we process or use.

While we follow generally accepted standards to protect Personal Data, no method of storage or transmission is 100% secure. You are solely responsible for protecting your password, limiting access to your devices, and signing out of the Predictive Platform after your sessions. If you have any questions about the security of our Website, please contact us via the “Contacting Us” section below.

## 12. Changes to this Privacy Statement

We will update this Privacy Statement from time to time to reflect changes in our practices, technology, legal requirements and other factors. If we do, we will update the “effective date” at the top of this Privacy Statement. If we make an update, we may provide you with notice prior to the update taking effect, such as by posting a conspicuous notice on our Website or by contacting you using the email address you provided.

We encourage you to periodically review this Privacy Statement to stay informed about our collection, processing and sharing of your Personal Data.

## 13. Contacting us

To exercise your rights regarding your Personal Data, or if you have questions regarding this Privacy Statement or our privacy practices please mail us at:

Predpol Data Protection Officer  
PO Box 2870, Santa Cruz, CA 95063-2870  
Email: [info@Predpol.com](mailto:info@Predpol.com)

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, and you are located in the EEA, you have the right to lodge a complaint with the competent supervisory authority.