

## Enveil Privacy Policy

Effective Date: January 1, 2018

This privacy and cookie policy (“Policy”) describes how Enveil, Inc. (“Company,” “we,” and “our”) collects, uses and shares personal data when using the website [www.enveil.com](http://www.enveil.com) (the “Site”) and Application Explorer (the “Application”), together (the “Services”). Please read the following information carefully to understand our views and practices regarding your personal data and how we will treat it.

### **1. PURPOSES OF PROCESSING**

#### **What is personal data?**

We collect information about you in a range of forms, including personal data. As used in this Policy, “personal data” is as defined in the UK Data Protection Act 1998/the European Data Protection Directive 95/46/EC/General Data Protection Regulation 2018 and any successor legislation, this includes any information which, either alone or in combination with other information we hold about you or identifies you as an individual, including for example, your name, postal address, email address and telephone number.

#### **Why do we need your personal data?**

We will only process your personal data in accordance with applicable data protection and privacy laws. We need certain personal data in order to provide you with access to [enveil.com](http://enveil.com) and our Application and Services. If you created a profile or registered with us, you will have been asked to tick to agree to provide this information in order to access our services, purchase our products, view our content. This consent provides us with the legal basis we require under applicable law to process your data. You maintain the right to withdraw such consent at any time. If you do not agree to our use of your personal data in line with this Policy, please do not use our Site, Application(s), or Services.

Your personal data may be provided to us by our customers. In such cases, we shall process such personal data as a data processor on behalf of those customers who use our services. In such instances, our customer’s privacy policy, rather than this Privacy Policy, will apply to our processing of your personal data.

### **2. COLLECTING YOUR PERSONAL DATA**

We collect information about you in the following ways:

#### **Information You Give Us.** This includes:

- the personal data you provide when you register to use our Site, Application(s) or Services, including your name, postal address, email address, telephone number, username, password and demographic information (such as your job title);
- the personal data that may be contained in any comment or other submission you upload or post to the Site, Application(s) or Services;

- the personal data you provide in connection with our promotions we run on the Site, Application(s) or Services;
- the personal data you provide when you report a problem with our Site, Application(s) or Services, or when we provide you with customer support;
- the personal data you provide when you make a purchase thorough our Site, Application(s) or Services; and
- the personal data you provide when you correspond with us by phone, email or otherwise.
- Information from Social Networking Sites Our Site, Application(s) or Services include(s) interfaces that allow you to connect with social networking sites (SNS) such as LinkedIn, Twitter, and Facebook. If you connect to a SNS through the Site, Application(s) or Services, you authorize us to access, use, and store the information that you agreed the SNS could provide to us based on your settings on that SNS. We will access, use and store that information in accordance with this Policy. You can revoke our access to the information you provide in this way at any time by amending the appropriate settings from within your account settings on the applicable SNS.

**Information We Get from Others.** We may also get information about you from other sources. For example, if you have agreed to share information with one of our partners or from other sources we may add this to information we get from our Site, Application(s) or Services.

**Information Automatically Collected.** We automatically log information about you and your computer or mobile device when you access our Site, Application(s) or Services. For example, when visiting our Site, Application(s) or Services, we log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Site, Application(s) or Services, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Site, Application(s) or Services. We collect this information about you using cookies. Please refer to the sections on cookies, Flash Technology and Pixel Tags below.

**Automated Decision Making and Profiling.** We do not use your personal data for the purposes of automated decision-making. However, we may do so in order to fulfill obligations imposed by law, in which case we will inform you of any such processing and provide you with an opportunity to object.

### 3. COOKIES

#### What are cookies?

We may collect information using “cookies.” Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site, Application(s) or Services.

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which are used only by us to recognize your computer or mobile device when it revisits our Site, Application(s) or Services; and (2) third party cookies, which are served by service providers on our

Site, Application(s) or Services, and can be used by such service providers to recognize your computer or mobile device when it visits other websites.

### **Cookies we use**

Our Site, Application(s) or Services use[s] the following types of cookies for the purposes set out below:

#### **Essential Cookies**

These cookies are essential to provide you with services available through our Site, Application(s), and Services and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Site, Application(s), and Services and help the content of the pages you request load quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.

#### **Functionality Cookies**

These cookies allow our Site, Application(s), and Services to remember choices you make when you use our Site, Application(s), and Services, such as remembering your language preferences, remembering your login details and remembering the changes you make to other parts of our Site, Application(s), and Services which you can customize. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Site, Application(s), and Services.

#### **Analytics and Performance Cookies**

These cookies are used to collect information about traffic to our Site, Application(s), and Services and how users use our Site, Application(s), and Services. The information gathered does not identify any individual visitor. The information is aggregated and anonymous. It includes the number of visitors to our Site, Application(s), and Services, the websites that referred them to our Site, Application(s), and Services, the pages they visited on our Site, Application(s), or Services, what time of day they visited our Site, Application(s), or Services, whether they have visited our Site, Application(s), and Services before, and other similar information. We use this information to help operate our Site, Application(s), and Services more efficiently, to gather broad demographic information and to monitor the level of activity on our Site, Application

We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Site, Application(s), and Services works. You can find out more information about [Google Analytics cookies](https://developers.google.com/analytics/resources/concepts/gaConceptsCookies) here: <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies>.

You can find out more about how Google protects your data here: [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html)

You can prevent the use of Google Analytics relating to your use of our Site, Application(s), and Services by downloading and installing the browser plugin available via this link: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>.

### **Targeted and advertising cookies**

These cookies track your browsing habits to enable us to show advertising which is more likely to be of interest to you. These cookies use information about your browsing history to group you with other users who have similar interests. Based on that information, and with our permission, third-party advertisers can place cookies to enable them to show adverts which we think will be relevant to your interests while you are on third-party websites.

You can disable cookies which remember your browsing habits and target advertising at you by visiting <http://www.youronlinechoices.com/uk/your-ad-choices>. If you choose to remove targeted or advertising cookies, you will still see adverts but they may not be relevant to you. Even if you do choose to remove cookies by the companies listed at the above link, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored adverts from companies that are not listed.

### **Social Media Cookies**

These cookies are used when you share information using a social media sharing button or “like” button on our Site, Application(s), or Services or you link your account or engage with our content on or through a social networking website such as Facebook, Twitter or Google+. The social network will record that you have done this.

### **Disabling cookies**

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings”, “help”, “tools”, or “edit” facility). Many browsers are set to accept cookies until you change your settings.

Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.com/uk](http://www.youronlinechoices.com/uk).

If you do not accept our cookies, you may experience some inconvenience in your use of our Site, Application(s) or Services. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Site, Application(s) or Services.

## **4. PIXEL TAGS**

We may also use pixel tags (which are also known as web beacons and clear GIFs) on our Site, Application(s) or Services to track the actions of users on our Site, Application(s) or Services. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. Pixel tags measure the success of our marketing campaigns and

compile statistics about usage of the Site, Application(s) or Services, so that we can manage our content more effectively. The information we collect using pixel tags is not linked to our users' personal data.

## 5. DO NOT TRACK SIGNALS

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to do not track signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.]

## 6. ADVERTISING

**Generally.** We may use other companies to serve third-party advertisements when you visit and use the Site, Application(s) or Services. These companies may collect and use click stream information, browser type, time and date, subject of advertisements clicked or scrolled over during your visits to the Site, Application(s) or Services and other websites in order to provide advertisements about goods and services likely to be of interest to you. These companies typically use tracking technologies to collect this information. Other companies' use of their tracking technologies is subject to their own privacy policies.

**Targeted Advertising.** In order to serve offers and advertisements that may interest you, we may display targeted advertisements on the Site, Application(s) or Services, or other digital properties or applications in conjunction with our content based on information provided to us by our users and information provided to us by third parties that they have independently collected. We do not provide personal data to advertisers when you interact with an advertisement.

**Your Ad Choices.** Some of the third-party services providers and/or advertisers may be members of the Network European Interactive Digital Advertising Alliance ("EDAA") Self-Regulatory Program for Online Behavioural Advertising. To learn more, visit <http://www.edaa.eu/edaa-for-users> which provides information regarding targeted advertising and the "opt-out" procedures of EDAA members.

## 7. USING YOUR PERSONAL DATA

We may use your personal data as follows:

- to operate, maintain, and improve our Site, Application(s) or Services products, and services;
- to manage your account, including to communicate with you regarding your account, if you have an account on our Site, Application(s) or Services;
- to operate and administer our rewards program and other promotions you participate in on our Site, Application(s) or Services;
- to respond to your comments and questions and to provide customer service;
- to send information including technical notices, updates, security alerts, and support and administrative messages;
- with your consent, to send you marketing e-mails about upcoming promotions, and other news, including information about products and services offered by us and our affiliates. You may opt-out of receiving such information at any time: such marketing emails tell you how to "opt-out." Please note, even if you opt out of receiving marketing emails, we may still send you non-

marketing emails. Non-marketing emails include emails about your account with us (if you have one) and our business dealings with you;

- to process payments you make via our Site, Application(s) or Services;
- to link or combine user information with other personal data;
- as we believe necessary or appropriate (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others; and
- as described in the “Sharing of your Personal Data” section below.

## 8. SHARING YOUR PERSONAL DATA

We may share your personal data as follows:

- **Third Parties Designated by You.** We may share your personal data with third parties where you have provided your consent to do so.
- **Our Third Party Service Providers.** We may share your personal data with our third-party service providers who provide services such as data analysis, payment processing, information technology and related infrastructure provision, customer service, email delivery, auditing and other similar services. These third-parties are only permitted to use your personal data to the extent necessary to enable them to provide their services to us. They are required to follow our express instructions and to comply with appropriate security measures to protect your personal data.
- **Affiliates.** We may share some or all of your personal data with our affiliates, in which case we will require our affiliates to comply with this Policy. In particular, you may let us share personal data with our affiliates where you wish to receive marketing communications from them.
- **Corporate Restructuring.** We may share personal data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- **Other Disclosures.** We may share personal data as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

## 9. ANONYMOUS DATA

When we use the term “anonymous data,” we are referring to data and information that does not permit you to be identified or identifiable, either alone or when combined with any other information available to a third party.

We may create anonymous data from the personal data we receive about you and other individuals whose personal data we collect. Anonymous data might include analytics information and information collected by us using cookies. We make personal data into anonymous data by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyze usage patterns in order to make improvements to our Site, Application(s) or Services.

## **10. THIRD PARTY SITES**

Our Site, Application(s) or Services may contain links to third-party websites and features. This Policy does not cover the privacy practices of such third-parties. These third-parties have their own privacy policies and we do not accept any responsibility or liability for their websites, features or policies. Please read their privacy policies before you submit any data to them.

## **11. INTERNATIONAL DATA TRANSFER**

Your information, including personal data that we collect from you, may be transferred to, stored at and processed by us and our affiliates and other third-parties outside the country in which you reside, including, but not limited to the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By using our Site, Application(s) or Services, and providing your consent, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

## **12. SECURITY**

We seek to use reasonable organizational, technical and administrative measures to protect personal data within our organization. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us using the details in Section 18 below.

## **13. RETENTION**

We will only retain your personal data as long reasonably required for you to use the Site, Application(s), and/or to provide you with the Services, unless a longer retention period is required or permitted by law (for example for regulatory purposes).

## **14. OUR POLICY ON CHILDREN**

Our Site, Application(s) and Services is/are not directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us using the details in Section 18 below. We will delete such information from our files as soon as reasonably practicable.

## **15. SENSITIVE PERSONAL DATA**

Subject to the following paragraph, we ask that you not send us, and you not disclose, any sensitive personal data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through our Site, Application(s) or Services, or otherwise to us.

If you send or disclose any sensitive personal data to us, you consent to our processing and use of such sensitive personal data in accordance with this Policy. If you do not consent to our processing and use of such sensitive personal data, you must not submit such user generated content to our Site, Application(s) or Services.

## 16. YOUR RIGHTS

- **Opt-out.** You may contact us anytime to opt-out of: (i) direct marketing communications; (ii) any new processing of your personal data that we may carry out beyond the original purpose; or (iii) the transfer of your personal data outside the EEA. Please note that your use of some of the Site, Application(s) or Services may be ineffective upon opt-out.
- **Access.** You may access the information we hold about you at any time by contacting us directly at [info@enveil.com](mailto:info@enveil.com).
- **Amend.** You can also contact us to update or correct any inaccuracies in your personal data
- **Move.** Your personal data is portable – i.e. you to have the flexibility to move your data to other service providers as you wish.
- **Erase and forget.** In certain situations, for example when the information we hold about you is no longer relevant or is incorrect, you can request that we erase your data.

If you wish to exercise any of these rights, please contact us using the details in Section 18 below. In your request, please make clear: (i) what personal data is concerned; and (ii) which of the above rights you would like to enforce. For your protection, we may only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in any event, within one month of your request. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion.

## 17. COMPLAINTS

We are committed to resolve any complaints about our collection or use of your personal data. If you would like to make a complaint regarding this Policy or our practices in relation to your personal data, please contact us at [info@enveil.com](mailto:info@enveil.com). We will reply to your complaint as soon as we can and in any event, within 45 days. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority, which for the UK, is the Information Commissioner's Office.

## 18. CONTACT INFORMATION

We welcome your comments or questions about this Policy. You may contact us in writing at [info@enveil.com](mailto:info@enveil.com).

## 19. EMPLOYEE PERSONAL DATA

Enveil commits to cooperate with the panel established by the EU data protection authorities (DPAs) and comply with the advice given by the panel with regard to human resources data transferred from the EU



in the context of the employment relationship. Please contact us to be directed to the relevant DPA contacts.

## 20. ADDITIONAL INFORMATION FOR EUROPEAN UNION USERS

**Personal information.** References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

**Controller.** Enveil is the controller of your personal information for purposes of European data protection legislation. See the Contact Us section above for contact details.

**Legal bases for processing.** We use your personal information only as permitted by law. We are required to inform you of the legal bases of our processing of your personal information, which are described in the table below. If you have questions about the legal basis of how we process your personal information, contact us at [info@enveil.com](mailto:info@enveil.com).

Processing purpose	Legal basis
To provide our Sites	Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for the Services.
To market our products and services to you To create anonymous data for analytics For compliance, fraud prevention and safety	These processing activities constitute our legitimate interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
To comply with law	Processing is necessary to comply with our legal obligations
With your consent	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us at <a href="mailto:info@enveil.com">info@enveil.com</a> .

## 21. CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review our website for the latest information on our privacy practices. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Sites and in the app stores where our mobile applications are available for download. We may (and, where required by law, will) also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Sites.



Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Sites (or as otherwise indicated at the time of posting). In all cases, your continued use of the Sites after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

Last Updated: October 5, 2018