

Privacy Policy (Tier 1)

Updated: May 24, 2018

Hurify Digital Markets, Inc. ("Hurify") is committed to protecting your privacy and ensuring you have a positive experience on our website and in using our products and services (collectively, "Products"). This policy covers the Hurify website www.hurify.co and mobile applications and is applicable worldwide. For privacy practices when customers use our platform and cloud-based services, please refer to Hurify's Platform Privacy Policy.

This policy outlines our handling practices and how we collect and use the Personal Data you provide during your online and offline interactions with us. As used in this Privacy Policy, "Personal Data" means any information that can be used to individually identify a person, and may include, but is not limited to, name, email address, postal or other physical address, credit or debit card number, title, and other personally identifiable information.

If you reside in the European Union ("EU"), United Kingdom, Lichtenstein, Norway, Iceland or Switzerland, you may have additional rights with respect to your Personal Data, as further outlined below. These rights may include rights under the EU's General Data Protection Regulation ("GDPR"), if you are a resident of the EU, United Kingdom, Lichtenstein, Norway or Iceland.

Hurify Digital Markets, Inc. will be the controller of your Personal Data that is provided, collected and/or processed pursuant to this Privacy Policy, except where otherwise expressly stated below. If you have any questions about whether any of foregoing applies to you, please contact us using the information set forth in the "Contact Us" section below.

This policy may be updated from time to time for reasons such as operational practices or regulatory changes, so we recommend that you review our Privacy Policy when returning to our website.

Collection of your Personal Data

We collect the following categories of Personal Data about you when you use or otherwise interact with our Products:

- Name
- Title
- Email address
- Home/work/mobile telephone number
- Postal or other physical address
- LinkedIn profile information (when you use LinkedIn to log-in to our Products or to create an account for our Products)
- IP addresses and other information collected passively, as further detailed in the "Passive Collection" section below
- Device identifiers, as further described in the "Mobile Application" section below

We collect and/or process your Personal Data in connection with the below activities related to our Products:

- Account registration
- Use of certain Product features
- Generating reports based on information collected from use of our Products
- Requesting service and support for our Products and providing such support
- Placing transactions or orders
- Registering to attend a seminar or webinar
- Participating in an online survey
- Billing and collecting payments for our Products
- Participating in discussion groups or forums
- Registering for newsletter subscriptions
- Customizing the advertising and content you see

Processing of your Personal Data

We will use your Personal Data only in accordance with our Privacy Policy. If you do not wish us to continue using your Personal Data in this manner, you can request that your account be deactivated by contacting us as specified in the “Contact Us” section.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity (i.e. processing that is necessary for the performance of a contract with you, such as your user agreement with us that allows us to provide you with the Products) and our “legitimate interests” or the legitimate interest of others (e.g. our users) such as:

- Personalizing, improving or operating our Products and business
- Better understanding your needs and interests
- Fulfilling requests you make related to the Products
- Providing you with information and offers from us or third parties
- Complying with our legal obligations, resolving disputes with users, enforcing our agreements
- Protecting, investigating and deterring against fraudulent, harmful, unauthorized or illegal activity

We process Personal Data for purposes such as:

- To process your orders and deliver the Products that you have ordered
- To provide reports based on information collected from use of our Products
- To keep you up to date on the latest Product announcements, software updates, software upgrades, system enhancements, special offers, and other information
- To provide support and assistance for our Products
- To provide the ability to create personal profile areas and view protected content
- To provide the ability to contact you and provide you with shipping and billing information
- To provide customer feedback and support
- To provide and administer opt-in contests, sweepstakes or other marketing or promotional activities on the Hurify.us or affiliate websites
- To the extent you choose to participate, to conduct questionnaires and surveys in order to provide better products and services to our customers and end users
- To support recruitment inquiries

- To personalize marketing communications and website content based on your preferences, such as in response to your request for specific information on products and services that may be of interest
- To contact individuals that you refer to us and identify you as the source of the referral, in accordance with the “Referral” section below
- To meet contract or legal obligations

Referrals

If you choose to use our referral service to tell a friend about our products, you represent that you have their consent to provide us your friend’s name and email address. We will automatically send your friend a one-time email inviting him or her to visit the website. Unless we are authorized by your friend, we will only use your friend’s name and email address for the purposes of sending this one-time email and maintaining an activity log of our referral program.

Choice

You can choose whether to provide Personal Data to Hurify, but note that you may be unable to access certain options, offers, and services if they require Personal Data that you have not provided. You can sign-up, and therefore consent, to receive email or newsletter communications from us. If you would like to discontinue receiving these communications, you can update your preferences by using the “Unsubscribe” link found in such emails or by contacting us using the information in the “Contact Us” section of this policy.

Data Subject Rights

You have certain rights with respect to your Personal Data as set forth below. Please note that in some circumstances, we may not be able to fully comply with your requests, or we may ask you to provide us with additional information in connection with your request, which may be Personal Data, for example, if we need to verify your identity or the nature of your request. In such situations, however, we will still respond to let you know of our decision.

To make any of the following requests, contact us using the contact details referred to in the “Contact Us” section of this policy.

- **Access:** You can request more information about the Personal Data we hold about you. You can also request a copy of the Personal Data.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by logging into your service account. Please contact us as soon as possible upon noticing any such inaccuracy or incompleteness.
- **Objection:** You can contact us to let us know that you object to the collection or use of your Personal Data for certain purposes.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Portability:** You have the right to ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another entity where technically feasible.

- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Products.
- **Right to File Complaint:** You have the right to lodge a complaint about Hurify's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

Data Retention

How long we retain your Personal Data depends on the type of data and the purpose for which we process the data.

Passive Collection

Hurify and our third party service providers automatically collect some information about you when you use our Products, using methods such as cookies and tracking technologies (further described below). Information automatically collected includes Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the website and/or Products.

In addition, when you use some of our Products, network information is transmitted back to us such as Product usage information. This information is transmitted back to us so we can determine how users are interacting with our Products, to assist us with improving our Products, and to correct any problems that may occur.

Cookies and Tracking Technologies

Hurify and our partners use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and gather information about our user base, such as location information based on IP addresses. Users can control the use of cookies at the individual browser level. For more information regarding cookies or similar technologies, please review our Cookie Policy.

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Products do not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Products and after you leave our properties.

Mobile Application

When you download and use our Products, we automatically collect information on the type of device you use, operating system version, and the device identifier (or "UDID"). We send you push notifications from time-to-time in order to update you about any events or promotions that we may be running. If you no longer wish to receive these types of communications, you can turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

Geolocation

We collect information about where you are located when you are using our Products. We use this information for purposes such as optimizing your connection to our data center and suggesting customizations to your experience with our Products (e.g. your language preference). We share this information with parties such as our data center provider. If you do not wish to allow us to share your information in this manner please opt-out by contacting us at gdpr@hurify.co

Sharing your Personal Data

We do not sell or rent your Personal Data to third parties for marketing purposes unless you have granted us permission to do so.

We share Personal Data within Hurify and its affiliated companies, and with third party service providers for purposes of data processing or storage.

We also share Personal Data with business partners, service vendors and/or authorized third-party agents or contractors in order to provide requested Products or transactions, including processing orders, processing smart contract transactions, hosting event and seminar registration and providing customer support. We provide these third parties with Personal to complete/utilize the requested Product or transaction.

In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Data as set forth in this policy. As required by law, we may respond to subpoenas, court orders, or similar legal process by disclosing your Personal Data and other related information, if necessary. We also may use Personal Data and other related information to establish or exercise our legal rights or defend against legal claims.

We collect and possibly share Personal Data and any other additional information available to us in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Hurify's terms of service, or as otherwise required by law.

While navigating Hurify's website or Products, you may be directed to content or functionality that is hosted by a third-party. When information is collected on behalf of Hurify exclusively, Hurify's Privacy Policy will be referenced and will govern how your information is used. For other, non-Hurify sites or services, the site/service owner's privacy policy will be referenced. You should review such third party's privacy and security policies prior to use.

Security of your Personal Data

Hurify is committed to protecting the Personal Data you share with us. We utilize a combination of industry-standard security technologies, procedures, and organizational measures to help protect your Personal Data from unauthorized access, use or disclosure.

We recommend you take every precaution in protecting your Personal Data when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser. If you have any questions about the security of your Personal Data, you can contact us at dpo@hurify.co

Linked websites and third party services

Our websites and services may provide links to other third-party websites and services which are outside our control and not covered by this policy. We encourage you to review the privacy policies posted on these (and all) sites you visit or services you use.

Transfer and Storage of Personal Data

Our Products are hosted and operated in the United States ("U.S.") through Hurify and its service providers. We may transfer your Personal Data to the U.S., to any Hurify affiliate worldwide, or to third parties acting on our behalf for the purposes of processing or storage. By using any of our Products or providing any Personal Data for any of the purposes stated above, you consent to the transfer and storage of your Personal Data, whether provided by you or obtained through a third party, to the U.S. as set forth herein, including the hosting of such Personal Data on U.S. servers.

Standard Contractual Clauses

In certain cases, Hurify will transfer Personal Data from the EU in accordance with the European Commission-approved Standard Contractual Clauses, a copy of which can be obtained at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>.

Contact Us

California Privacy Rights: Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request the address below.

To address your individual rights or if you have any privacy-related questions or comments related to this privacy policy, please send an email to dpo@hurify.co. You can also contact us by writing to this address:

Hurify Digital Markets, Inc.
Attention: Privacy Officer
10900 NE 4th, Suite 2300
Bellevue, WA 98004

If you reside in the EU, United Kingdom, Lichtenstein, Norway or Iceland, you can also contact our Data Protection Officer at dpo@hurify.co.