## Sapien Privacy Policy

At Sapien, we value your privacy.

We strive to be transparent about how we collect and use your information, to keep your information secure and to provide tools to control your data.

We want you to understand how and why Sapien Network, Inc. ("Sapien," "we" or "us") collects, uses, and shares information about you when you access and use Sapien's websites, mobile apps, and other online products and services (collectively, the "Services") or when you otherwise interact with us.

This Privacy Policy applies to all of our Services and governs the manner in which Sapien collects, uses, maintains and discloses information collected from users (each, a "User") of the http://www.sapien.network website ("Site").

It also reflects the rules set by the European Union's General Data Protection Regulation (GDPR).

#### Information You Provide to Us

We collect information you provide directly to us when you use our Services. This includes:

## Information Regarding Your Use of the Services

We collect the content and other information you provide when you use our Services. This includes personal identification information used to create your account (e.g., a name, username, password, email address), account preferences, the content of messages between you and other users or communities, and the content of information you post to the Services (e.g., text, photos, videos, links).

Users may, however, visit our Site anonymously. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain Site related activities.

#### Transactional Information

If you purchase products or services from us, we will collect certain information from you, including your name, address, email address, and information about the product or service you are purchasing. If Payments are processed by third-party payment processors, so please refer to the applicable processor's terms and privacy policy for more information about how payment information is processed and stored.

#### Other Information

You may choose to provide other information directly to us. For example, we may collect information when you fill out a form, participate in contests, sweepstakes or promotions, apply for a job, communicate with us via third-party sites and services, request customer support or otherwise communicate with us.

# Information We Collect Automatically

We may collect non-personal identification information about Users whenever they interact with our Site. This includes:

#### Log and Usage Data

We may log information when you access and use the Services. This may include your IP address, browser type, operating system, referral URLs, device information (e.g., device IDs), pages visited, links clicked, user interactions (e.g., voting data), the requested URL, hardware settings, and search terms.

#### Information Collected from Cookies

Our Site may use "cookies" to enhance User experience. User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

## How We Use Information About You

Sapien may collect and use Users personal information for the following purposes:

- To run and operate our Site
   We may need your information to display content on the Site correctly.
- To improve customer service Information you provide helps us respond to your customer service requests and support needs more efficiently.
- To personalize user experience We may use information in the aggregate to understand how our Users as a group use the services and resources provided on our Site.
- To improve our Site
   We may use feedback you provide to improve our products and services.
- To send periodic emails
  We may use the email address to respond to their inquiries, questions, and/or other requests.

- To help protect the safety of Sapien and our users, which includes blocking suspected spammers, addressing abuse, and enforcing our Terms and Conditions;
- To send you technical notices, updates, security alerts, invoices and other support and administrative messages;
- To communicate with you about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to you (for information about how to opt out of these communications, see "Your Choices" below);
- To monitor and analyze trends, usage, and activities in connection with our Services (for information about how to manage your preferences, see "Your Choices" below).

#### Electronic newsletters

If User decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc.

# How we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

## How We Share Information

We do not sell, trade, or rent Users personal identification information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above.

When you use the Services, certain information may be shared with other users and the public. For example:

 When you submit a post or comment to the Services, visitors to and users of our Services will be able to see the content of your posts and comments, the username associated with your posts or comments, and the date and time you originally submitted the post or comment. Although some parts of the Services may be private or quarantined, they may become public and you should take that into consideration before posting to the Services.

- When you send private messages or messages via the chat application, the recipients of those messages will be able to see the content of your message, your username, and the date and time the message was sent.
- When other users view your profile, they will be able to see information about your activities on the Services, such as your username, prior posts and comments.

Please note that, even when you delete your account, the posts, comments and messages you submit through the Services may still be viewable or available on our servers. For more information, see "Your Choices" below.

We will not share, sell, or give away any of our users' personal information to third parties, unless one of the following circumstances applies:

- Except as it relates to advertisers and our ad partners, we may share information with vendors, consultants, and other service providers who need access to such information to carry out work for us;
- If you participate in contests, sweepstakes, promotions, special offers, or other events or activities in connection with our Services, we may share information with entities that partner with us to provide these offerings;
- We may share information (and will attempt to provide you with prior notice, to the
  extent legally permissible) in response to a request for information if we believe
  disclosure is in accordance with, or required by, any applicable law, regulation, legal
  process or governmental request, including, but not limited to, meeting national
  security or law enforcement requirements;
- We may share information in response to an emergency if we believe it's necessary to prevent imminent and serious bodily harm to a person;
- We may share information if we believe your actions are inconsistent with our user agreements, or other Sapien policies, or to protect the rights, property, and safety of ourselves and others;
- We may share information between and among Sapien, and its current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- We may share information with your consent or at your direction.

# Third party websites and Partners

Users may find advertising or other content on our Site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer

service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

We may partner with third-party advertisers, ad networks, and analytics providers to deliver advertising and content targeted to your interests and to better understand your use of the Services. These third parties may collect information sent by your computer, browser, or mobile device in response to a request for content, such as unique identifiers, your IP address, or other information about your computer or device. For example:

#### Advertisers and Ad Networks

Our ad partners and ad networks may use cookies and use related technologies to collect information when ads are delivered to you on our Services, but Sapien does not link to or provide them with your actual Sapien account details. This means that We does not share your individual account browsing habits with advertisers. We cannot see advertisers' cookies and advertisers will not see Sapien cookies.

#### **Analytics Partners**

We use analytics partners (such as Google Analytics or Mixpanel) to help analyze usage and traffic for our Services. As an example, we may use analytics partners to analyze and measure, in the aggregate, the number of unique visitors to our Services.

For more information about how you may control the collection and/or use of information for advertising and analytics purposes, please see "Your Choices."

## Age restriction

Our Services are intended for general audiences and are not directed to anyone under the age of 18. Therefore, individuals under the age of 18 may not create an account or otherwise access or use the Services. Bu using our Services, you represent and warrant that you are at least 18 years of age.

## Your Choices

As a Sapien user, you have choices about how to protect and limit the collection, use, and disclosure of, information about you. This includes:

#### **Account Settings**

We may provide you with tools and preference settings that allow you to access, correct, delete, and modify information associated with your account.

#### **Account Information**

You may delete your account information at any time by logging into your account and following the steps under "Settings".

When you delete your account, your profile is no longer visible to other users and disassociated from content you posted under that account. Please note, however, that the posts, comments, and messages you submitted prior to deleting your account will still be visible to others, unless you delete such content. We may also retain certain information about you as required by law or for legitimate business purposes after you delete your account.

## **Analytics**

In the Settings section, you can opt-in to allow Sapien to collect anonymized user data to improve out Services.

Some analytics providers we may partner with may provide specific opt-out mechanisms and we may provide, as needed and as available, additional tools and third-party services that allow you to better understand cookies and how you can opt-out.

You may also generally opt out of receiving personalized advertisements from certain third-party advertisers and ad networks.

#### **Promotional Communications**

You may opt out of receiving promotional communications from us by following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as information about your account or your use of our Services.

#### Mobile Notifications

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

#### International Data Transfers

Sapien is a global organization, headquartered in the United States, with service providers, corporate affiliates, and operations in several countries. In order to provide you with the services you sign up for by creating a Sapien account or visiting our website, your personal information will be transferred to and processed in the United States (or any other country where we, our corporate affiliates, agents, and service providers operate). Data protection laws differ among jurisdictions, and the United States and these other jurisdictions may not provide the same level of protection for personal information as your jurisdiction of residence. If you are from the European

Economic Area ("EEA") and we transfer your personal information to countries outside of the EEA, we will take appropriate steps to ensure your personal information is afforded the same level of protection as described in this Privacy Policy.

# Legal Basis for Processing Personal Information (European Economic Area)

If you are from the European Economic Area ("EEA), our legal basis for collecting and using the personal information described in this Privacy Policy will depend on the personal information concerned and the specific context in which we collect it. We collect and use your information for a variety of business purposes that are in our legitimate interests, in order to enter into or perform a contract with you, with your consent, or to comply with our legal obligations.

If you wish to learn more about specific legal grounds we rely on to process your information for any particular purpose (including any legitimate interests we have to process this information), please contact us as provided under the Contact Us section. For example, we rely on our legitimate interests to process information for direct marketing purposes and for fraud prevention and detection, provided these interests are not overridden by your data protection interests or fundamental rights and freedoms.

# Your Data Protection Rights (European Economic Area)

In some regions, such as the EEA, you may have certain rights in relation to your personal information, including the right to access, correct, update, or request deletion of your personal information. Sapien takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You also can manage your profile and settings within our Platform. However, if you are not a user of our Services and you want to contact us directly about accessing, correcting, updating, or deleting your personal information, or altering your data or marketing preferences, you can do so at any time by contacting as provided in the Contact Us section. We will consider your request in accordance with applicable laws.

You can object to processing of your personal information, ask us to restrict processing of your personal information, or request portability of your personal information. Again, you can exercise these rights by contacting us as provided in the Contact Us section. You also can deactivate your profile and obtain a copy of your information through your settings.

You can complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA and Switzerland are available <a href="https://example.com/here">here</a>.

Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal,

nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

If you wish to make a request based on the above, please inform us by visiting our website and going to the 'Contact Us' page. We may request evidence of your identity for verification purposes. We will respond to your request within the applicable statutory term.

# Changes

We may change this Privacy Policy from time to time. If we do, we will let you know by revising the date at the top of the policy. If we make a change to this policy that, in our sole discretion, is material, we will provide you with additional notice (such as adding a statement to the front page of the Services or sending you a notification). We encourage you to review the Privacy Policy whenever you access or use our Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy. If you continue to use our Services after Privacy Policy changes go into effect, you consent to the revised policy.

#### Contact Us

team@sapien.network

Effective May 25, 2018.