PRIVACY POLICY

Last Updated and Effective: June 15, 2021

# Welcome!

Welcome to Hellō! This Privacy Policy is here to help you understand how we collect, use, disclose, and process your Personal Data (as defined below). We also describe your choices and rights with respect to how we process that Personal Data. Please read this policy carefully.

# Who We Are

This is the Privacy Policy (“**Policy**”) of Hello Cooperative (**“Company”, “us”, “our”,** or **“we”**), a Washington Cooperative with offices at 516 Yale Ave N, Seattle WA, 98109. You can contact us using the information below.

# Applicability

This Policy applies to our “**Service**” which include our websites at hello.coop, hellō.net, hellō.world, & hello (including any subdomains or mobile versions the “**Site**”), our cloud-based software application and service, and any of our mobile applications (“**Apps**”).

# Agreement

This Policy is referenced in our Terms of Use and capitalized terms not defined in this Policy will have the definition provided in the Terms of Use.

**Your use of our Service indicates your acknowledgement of the practices described in this Policy.**

# Third Parties

We integrate with third party services that provide information used to authenticate your identity (our “**Partners**”).

This Policy reflects only how we process Personal Data through our Service. This Policy does not apply to information processed by our Partners or other third parties, for example, when you create or use Partner accounts, visit a third-party website or interact with third-party services, unless those parties collect or process information on our behalf. Please review any relevant third party’s privacy policy for information regarding their privacy practices.

# Collection and Use of Personal Data

## Personal Data We Collect

In order to provide our Service, we may collect and process information that relates to identified or identifiable individuals (“**Personal Data**”). We collect and process the following categories of Personal Data (note, specific Personal Data elements are examples and may change):

*Identity Data*: Personal Data about you and your identity, such as your name, username, biographic/profile data, employer information, and other Personal Data you may provide on registration forms or as part of an account profile.

*Contact Data:* Identity Data used to contact an individual, e.g. email address, physical address, or phone number.

*Device/Network Data:* Personal Data relating to your device, browser, or application e.g. IP addresses, application ID; and other Personal Data related to your browser such as information in the HTTP headers sent from your browser, or cookies that we set in your browser.

*User Content*: Personal Data included in content provided by users of the Service in any free-form or unstructured format, such as in a “contact us” box, free text field, in a file or document, or messages to us.

## How We Collect Personal Data

We collect Personal Data from various sources based on the context in which the Personal Data will be processed:

*Data we collect from you*: We collect Personal Data from you directly, for example, when you input information into an online form, or contact us directly.

*Data we receive from others*: We receive Personal Data from third parties with whom we have a relationship in connection with a relevant transaction, for example, we may receive certain Personal Data from third party services when you use the third party service to authenticate your identity to our Service.

*Data collected automatically*: We may collect certain Personal Data automatically. For example, we collect Device/Network Data automatically using cookies and similar technologies when you use our Service, access our Sites, or when you open our communications.

## How we Process Personal Data

### Service Registration

If you register for our Service, we will process Identity Data and Contact Data in connection with the creation, operation, and maintenance of your account. We may also collect certain User Content from you, for example, in response to a request for data, information, file uploads, or similar.We use this Identity Data, Contact Data, and User Content as necessary to create, maintain, and provide you with important information about your account, and to otherwise provide the services and features you request.

### Use of the Service

When you use our Service, we may collect Identity Data, Device/Network Data, and in some cases, Contact Data made available via an authentication Partner if you connect with that Partner through our Service. We will make available a unique token verifying your identity when you authenticate your identity with any other Partner that integrates with our Service. We process Personal Data through our Service strictly as necessary to provide the identity verification services you request, and as otherwise necessary to provide our Service.

### Communications

We may process Identity Data, Device/Network Data and Contact Data in connection with email communications, such as service updates or outage reports. Similarly, we may process this Personal Data in connection with marketing/promotional emails, which you might receive if you choose to receive marketing communications, or engage in a transaction allowing us to send you those marketing communications.

Subject to your rights & choices, we use Identity Data and Contact Data as necessary to customize, deliver, and otherwise process email communications, and in order to tailor certain communications to individuals’ preferences and requests. Additionally, we may process Device/Network Data from devices receiving email communications as part of our business interests in understanding whether our emails are opened or other aspects of engagement with such email communications.

### Contact Us

When you contact us though the Site using a contact us box, through our chat, or via email, we process Personal Data such as Identity Data, Device/Network Data, and any Personal Data contained within any User Content. We use Identity Data, Contact Data, and User Content as necessary to communicate with you about the subject matter of your request and related matters.

### Cookies and Similar Tracking Technologies

We, and certain third parties, automatically collect and process Identity Data, Contact Data, and Device/Network Data when you interact with cookies and similar technologies on our Service. We may receive this data from third parties to the extent allowed by the applicable partner. Please note that the privacy policies of third parties may also apply to these technologies and the Personal Data collected through them.

Subject to your rights & choices, we may use this information as follows:

1. for “essential” or “functional” purposes, such as to enable certain features of the Service, or keeping you logged in during your session;
2. for “analytics” and “personalization” purposes, consistent with our business interest in how the Service is used or perform, how users engage with and navigate through our Service, what sites users visit before visiting the Service, how often they visit the Service, and other similar information, as well as to greet users by name and modify the appearance of the Service to usage history, tailor the Service based on geographic location, and understand characteristics of users in various technical and geographic contexts; and

*Note:* Some of these technologies can be used to identify you across platforms, devices, sites, and services.

## **Business Purposes of Processing**

In addition to the processing described above, we generally process Personal Data for several common purposes in connection with our business. For example, we process your Personal Data:

* To provide our Service and fulfill our obligations to you
* To provide, improve, and secure our products and Service
* To enable and improve our Service
* To comply with the law, and in the public interest

Please see below for more information regarding the purposes for which we process your Personal Data.

Operate our Service and Fulfill Obligations

We process any Personal Data as is necessary to provide the Service, and as otherwise necessary to fulfill our obligations to you, e.g. to provide you with the information, features, and services you request.

### Internal Processes and Service Improvement

We may use any Personal Data we process through our Service as necessary in connection with our improvement of the design of our Service, understanding how are Service is used or function, for customer service purposes, in connection with the creation and analysis of logs and metadata relating to service use, and for ensuring the security and stability of the Service. Additionally, we may use Personal Data to understand what parts of our Service are most relevant to users, how users interact with various aspects of our Service, how our Service performs or fails to perform, etc., or we may analyze use of the to determine if there are specific activities that might indicate an information security risk to the Service or our users. This processing is subject to users' rights and choices.

### Aggregate Analytics

We process Personal Data as necessary in connection with our creation of aggregate analytics relating to how our Service is used, the products and services our users purchase, to create service delivery metrics, and to create other reports regarding the use of our Service, demographics of our users, and other similar information and metrics. The resulting aggregate data will not contain information from which an individual may be readily identified. This processing is subject to users' rights and choices.

### Compliance, Safety & Public Interest

Note that we may, without your consent or further notice to you, and to the extent required or permitted by law, process any Personal Data subject to this Policy for purposes determined to be in the public interest or otherwise required by law. For example, we may process information as necessary to fulfil our legal obligations, to protect the vital interests of any individuals, or otherwise in the public interest or as required by a public authority. Please see the data sharing section for more information about how we disclose Personal Data in extraordinary circumstances.

### Other Processing of Personal Data

If we process Personal Data in connection with our Service in a way not described in this Policy, this Policy will still apply generally (e.g. with respect to users' rights and choices) unless otherwise stated when you provide it.

# Data Sharing

Information we collect may be shared with a variety of parties, depending upon the purpose for and context in which that information was provided. We generally transfer data to the categories of recipients or in connection with specific business purposes, each described below.

### Service Providers

In connection with our general business operations, product/service improvements, to enable certain features, and in connection with our other lawful business interests, we may share Personal Data with service providers or subprocessors who provide certain services or process data on our behalf. For example, we may use cloud-based hosting providers to host our Service or disclose information as part of our own internal operations, such as security operations, internal research, etc.).

### Corporate Events

Your Personal Data may be processed in the event that we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

### Affiliates

In order to streamline certain business operations, share promotions and content we believe would be of interest to you, and develop products and services that better meet the interests and needs of our Partners, we may share your Personal Data with any of our current or future affiliated entities, subsidiaries, and parent companies.

### Legal Disclosures

In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use or a Partners agreement, or in the vital interests of us or any person. Note, these disclosures may be made to governments that do not ensure the same degree of protection of your Personal Data as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Data to such parties.

# Your Rights & Choices

## Your Rights

Applicable law may grant you rights in your Personal Data. These rights vary based on your location, state/country of residence, and may be limited by or subject to our or our Partners’ own rights in your Personal Data. In cases where we process Personal Data on our own behalf, you may exercise rights you have by contacting us at contact@hello.coop.

All rights requests we receive directly must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Data. We may require that you log in to your account or verify that you have access to your account or the email on file in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent’s authority to act on your behalf.

**Note:** We are able to fulfill rights requests regarding Personal Data that we control or process. We may not have access to or control over Personal Data controlled by third parties, including our Partners. Please contact the third party directly to exercise your rights in third party-controlled information.

## Your Choices

You may have the following choices regarding the Personal Data we process, to the extent required under applicable law:

*Consent*: If you consent to processing, you may withdraw your consent at any time. You may be required to close your account in order to withdraw consent where your consent is necessary to perform essential aspects of our Service.

*Direct Marketing*:You have the choice to opt-out of or withdraw your consent to marketing communications. You may have a legal right not to receive such messages in certain circumstances, in which case, you will only receive direct marketing communications if you consent. You may exercise your choice via the links in our communications or by contacting us re: direct marketing.

*Cookies & Similar Tech*: If you do not want information collected through the use of cookies and similar technologies, you can manage/deny cookies and certain similar technologies using your browser’s settings menu. You must opt out of the use of some third party services directly via the third party.

*Other Processing*:You may have the right under applicable law to object to our processing of your Personal Data for certain purposes, including without limitation, situations where we process in accordance with our business interests. You may do so by contacting us re: data rights requests. Note that we may not be required to cease processing based solely on your objection.

# Security

We implement and maintain reasonable security measures to safeguard the Personal Data you provide us. However, we sometimes share Personal Data with third parties as noted above, and though we may enter contracts to help ensure security, we do control third parties’ security processes. We do not warrant perfect security and we do not provide any guarantee that your Personal Data or any other information you provide us will remain secure.

# Data Retention

We retain information for so long as it, in our discretion, remains relevant to its purpose, and in any event, for so long as is required by law. We will review retention periods periodically, and may sometimes pseudonymize or anonymize data held for longer periods, if appropriate.

# Minors

Our Service is neither directed at nor intended for use by minors under the age of majority in the relevant jurisdiction. Further, we do not knowingly collect Personal Data from such individuals. If we learn that we have inadvertently done so, we will promptly delete it.

# International Transfers

We operate in and use service providers located in the United States. If you are located outside the U.S., your Personal Data may be transferred to the U.S. The U.S. may not provide the same legal protections guaranteed to Personal Data in foreign countries. Contact us for more information regarding transfers of data to the U.S.

# Changes to Our Policy

We may change this Policy from time to time. Please visit this page regularly so that you are aware of our latest updates. Your use of the Service following notice of any changes indicates acceptance of any changes.

# Contact Us

Feel free to contact us with questions or concerns at: contact@hello.coop