

Effective Date [NTD: Should match up with T&C]

Your Privacy Matters

MAX Aspire's mission is to facilitate the pursuit of excellence by connecting colleagues, young industry professionals, senior industry professionals, and other like-minded business leaders and aspirants through the Website (the "**Service**") in order to share insights and inspire future opportunities. Central to this mission is our commitment to be transparent about the data we collect about you, how it is used and with whom it is shared. This Privacy Policy applies when you use our Services (described below). [NTD: team to confirm this is an accurate description]

Introduction

We are an online platform for select professionals. Members use our Services to connect with others and pursue career, business and entrepreneurial advancement. Our Privacy Policy applies to any Member or Visitor to our Services.

All users of our platform, whether registered ("**Members**") or otherwise (i.e. non-members, herein referred to as "**Visitors**") will be asked to share their professional identities, engage with their network, exchange knowledge and professional insights, post and view relevant content, learn and develop skills, and find business and career opportunities. Content and data on some of our Services is viewable to non-members.

Services

This Privacy Policy applies to MAX Aspire and other MAX Aspire-related sites, apps, communications and services unless otherwise noted by other services or platforms. MAX Aspire facilitates connections between colleagues, young industry professionals and senior industry professionals, and other like-minded entrepreneurs and business leaders who use the services provided through the Website (the "**Services**") in order to share insights and inspire future opportunities.

I. Objectives In Collecting Your Data

We aim to collect, use and disclose only such information as is required to enable us to manage your Account, to provide/personalize/improve the Services, to maintain our member/visitor lists, to respond to your inquiries or provide feedback, for identification and authentication purposes, and for marketing and such other purposes of which we may inform you by updating this privacy policy from time to time or as otherwise set out in this policy. We will maintain, to the best of our abilities, the confidentiality of any information you provide to us throughout your use of the Services and will use it only for the purposes for which we have collected it (subject to any exclusions and disclosures noted herein), unless you explicitly agree that we may disclose it to other third parties.

We collect information for the following purposes:

I. Services: we collect information in order to be able to provide the following services (the “**Services**”) to you:

- (a) providing, operating, maintaining, improving, and promoting the Website and Apps;
- (b) enabling you to access and use the Website and Apps, including uploading, downloading, collaborating on, and sharing content; and
- (c) personalizing the Website, Apps, content or features.

2. Communications: designating and sending transactional messages in order to:

- (a) introduce you to a MAX Aspire community members;
- (b) respond to your comments, questions, and requests;
- (c) provide customer service and support;
- (d) send you technical notices, updates, security alerts, and support and administrative messages;
- (e) send you promotional communications, such as providing you with information about services, features, newsletters, offers, promotions, contests, events, and updates about your community; and
- (f) monitor and analyze trends, usage, and activities in connection with the Website and App and for marketing or advertising purposes.

3. Investigation: investigating and preventing fraudulent transactions, unauthorized access to the Website, Apps and other illegal activities.

4. Statistics: we also collect statistics about the use of the Services. This information is and will continue to be kept confidential. Notwithstanding the foregoing, aggregate statistics that do not personally identify an individual will be kept by us and such aggregate statistics may be made available to other users or to third parties.

II. AMENDMENTS / CHANGES

MAX Aspire (“**we**” or “**us**”) can modify this Privacy Policy at any time and, if we make material changes to it, we will provide notice through our Services, or by other means. If you object to any changes, you may close your account.

Your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy, as of its effective date. **[NTD: Need to ensure we have the internal controls to send out notice whenever this PP has changed]**

III. WHAT WE COLLECT

A) Data You Provide To Us

A.1 - Registration

To create an account you need to provide data including your name, email address and/or mobile number, profile photo, resume and information about your educational and professional status along with a password.

A.2 - Profile

While You have some choices about the information you want to input onto your profile, in many cases inputting more information could assist with getting better value from the Services including helping colleagues and business opportunities find you. However, once uploaded there will be limitations on your ability to change information in between certain intervals, which may in turn change from time to time in accordance with this Policy and our Terms and Conditions. If you are concerned about submitting sensitive information on your profile, particularly where such is required by Us, do not enlist register for the Services. As a rule of thumb, assume that any personal data added to your profile could be publicly available.

A.3 - Posting and Uploading

We collect personal data from you when you provide, post or upload it to our Services. If you utilize a tool of ours that imports your address book, we receive your contacts (including contact information your service provider(s) or app automatically added to your address book when you communicated with addresses or numbers not already in your list).

If you utilize a tool of ours that syncs your contacts or calendars with our Services, we may collect your address book and calendar meeting information to keep growing your network by suggesting connections for you and others, and by providing information about events (e.g. times, places, attendees and contacts).

You don't have to post or upload personal data; though if you don't, it may limit your ability to grow and engage with your network over our Services.

B) Data From Others

B.1 Posts

You and others may post content that includes information about you, job postings, board positions and other opportunities) on our Services. We may, as part of our Services, collect information (both public and what you provide) about you and make it available as part of our Services (e.g. suggestions for your profile and potential matches for a "coffee chat").

B.2 Your Usage

We may log your visits and use of our Services, including via mobile apps (forthcoming). We may also log usage data when you visit or otherwise use our Services, including our sites, app and platform technology, such as when you view or click on content (e.g., learning video) or ads (on or off our sites and apps), perform a search, install or update one of our mobile apps, share articles or apply for jobs.

C) Messages

We collect information about you when you send, receive, or engage with messages in connection with our Services. For example, if you get a MAX Aspire connection request, we track whether you have acted on it and will send you reminders.

D) Other

Our Services are dynamic, and we often introduce new features, which may require the collection of new information. If we collect materially different personal data or materially change how we collect, use or share your data, we will notify you and may also modify this Privacy Policy.

IV. How We Use Your Data

How we use your personal data will depend on which Services you use and how you use those Services. We use the data that we have about you to provide and personalize our Services, including with the help of automated systems and inferences we make, so that our Services (including ads) can be more relevant and useful to you and others.

A) Services

We collect information in order to be able to provide the “Services” to you.

This includes:

- providing, operating, maintaining, improving, and promoting the Website and Apps;
- enabling you to access and use the Website and Apps, including uploading, downloading, collaborating on, and sharing content;

B) Statistics

We also collect statistics about the use of the Services. This information is and will continue to be kept confidential. Notwithstanding the foregoing, aggregate statistics that do not personally identify an individual will be kept by us and such aggregate statistics may be made available to other users or to third parties.

V. WHO WE SHARE DATA WITH

We do not sell, rent, share or otherwise distribute your Personal Information to any third parties without your permission except as disclosed in this Policy (see further Important Exceptions below).

A) Information Shared in the Provision of the Services

For the purpose of providing the Services, we may share your Personal Information with the MAX Aspire community including other members, administrators and/or third-party paid partners (where applicable). This sharing of information is essential to allow for introductions between members and will be limited to what is necessary to:

- deliver and support our products and Services;
- process and respond to your inquiries and provide you with customer support;

- contact you with information that we believe will be of interest to you (such as product announcements, software updates, and special events);
 - analyze the accuracy, effectiveness, usability, or popularity of the Services;
 - improve the content and features of the Services or develop new Services;
 - allow us to personalize the content that you see on the Services;
 - enforce the legal terms that govern your use of the Services; and
 - administer and troubleshoot the Services.
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B) Information Shared with Our Service Providers

For the purposes of improving our technology, products, and Services, we may employ and contract with service providers, consultants, subcontractors and professional advisers - individuals and entities that perform certain tasks on our behalf (collectively “Service Providers”). We may need to share Personal Information with our Service Providers in order to provide products or services to you or to allow them to carry out their respective duties. We request that our Service Providers use Personal Information or other information we share with them solely for the purpose of assisting us. Such Service Providers may also have limited access to databases of user information solely for the purpose of helping us improve the Services.

C) Information Shared For Legal and Related Purposes

We may disclose your Personal Information to third parties without your consent if we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other Website members, other users of the Services, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. Further, we may disclose Personal Information when we believe in good faith that such disclosure is required by and in accordance with the law. We also reserve the right to access, read, preserve, and disclose any information as we reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request, (ii) enforce our user agreement, including investigation of potential violations hereof, (iii) and detect, prevent, or otherwise address fraud, security or technical issues. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention. Notwithstanding the general terms of this policy, the collection, use, and disclosure of Personal Information may be made outside of the terms herein to the extent provided for in any applicable privacy or other legislation in effect from time to time, or pursuant to court orders.

D) Information Disclosed Pursuant to Business Transfers

We may also disclose your Personal Information in connection with a corporate reorganization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or shares, including any due diligence exercise carried out in relation to the same, provided that the entity acquiring the Information continues to use it for, and only for the purposes permitted by this Privacy Policy. In some

cases, we may choose to buy or sell assets. In these types of transactions, user information, including Personal 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 as permitted by law. Following the transfer of user information in the circumstances described in this paragraph, all inquiries concerning the processing of user information should be directed to the entity to which the information is transferred.

E) Information We Share With Your Consent

In addition to the types of sharing Personal Information described above, we may share your information with third parties with your consent.

VI. Data Retention

We generally retain your personal data as long as you keep your account open or as needed to provide you Services. This includes data you or others provided to us and data generated or inferred from your use of our Services. Even if you only use our Services when looking for a new job every few years, we will retain your information and keep your profile open, unless you close your account. In some cases we may choose to retain certain information indefinitely (e.g., insights about Services use) in a depersonalized or aggregated form. In general, we will only retain your personal data in accordance herewith. **[NTD: Need to ensure we have these internal controls to delete data upon account closure]**

A) Information Retained for Legal Purposes

We may retain your personal data even after you have closed your account to, among other things, comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our User Agreement, or fulfill your request to "unsubscribe" from further messages from us. We will retain de-personalized information after your account has been closed. **[NTD: Important to ensure we have controls that render any information retained as depersonalized]**

B) Information Retained By Third Parties

Information you have shared with others (e.g., through direct messages, updates or group posts) will remain visible after you close your account or delete the information from your own profile or mailbox, and we do not control data that others have copied out of our Services.

5. Other Important Information

A) Security

We monitor for and try to prevent security breaches. Please use the security features available through our Services.

We implement security safeguards designed to protect your data. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

B) Expatriation of Data / Data Transfers

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you provide information to us, please note that we host data using third party providers and may transfer the data, including Personal Information, to another jurisdiction other than your own (including a jurisdiction outside of the EU) and process it there.