Privacy and Data Policy (Last Updated: June 15, 2021)

Linkgear Foundation LLC (collectively, “LGF”) wants you to enjoy our websites, apps, and other online services secure in the knowledge that we have implemented fair and transparent information practices designed to protect, and provide you with control of, your privacy. LGF owns and operates public-facing websites (including linkgear.org, ttData platform, and apps); operates Facebook pages, groups, and bots; delivers newsletters and other content via email and text messages; and makes the same or similar content available to mobile users, including via iOS and Android apps (LGF, LGF Brief, and Flags) (collectively, the “Services”). Our Privacy and Data Policy applies when you use any of these Services. It describes the kinds of information we may gather when you use the Services, how we use your information, when we might disclose your information, and how you can manage your information.

Our Privacy and Data Policy does not govern or apply to information collected or used by LGF through other means. It also does not apply to websites maintained by other companies or organizations to which we may link or who may link to us. We are not responsible for the actions and privacy policies of third-party websites.

By using our Services, you are accepting the practices described in our Privacy and Data Policy, including our use of cookies and similar online tools. If you do not agree to the terms of this Privacy and Data Policy, please do not use our Services. We reserve the right to modify or amend the terms of our Privacy and Data Policy from time to time without notice. Your continued use of our Services following the posting of changes to these terms will mean you accept those changes. If we intend to apply the modifications or amendments to this Privacy and Data Policy retroactively or to personal information already in our possession, we will provide you with notice of the modifications or amendments and seek your consent for such use. If you are a resident of the European Economic Area (“EEA”) or Switzerland, please see the “Users in the EEA and Switzerland” section of this Privacy and Data Policy. LGF is seeking approval from the Department of Commerce of its self-certification pursuant to its Privacy Shield Framework. Once final approval is received, this Policy will be updated with a link to LGF’s Privacy Shield Policy. Please note that our Services are under constant development. This Privacy and Data Policy may therefore be modified and updated on an ongoing basis. Please check back to this page regularly.

HIPAA RELATED ITEMS

Based on the HIPPA the Mobile Health Apps test, refer this website, <https://www.hhs.gov/hipaa/for-professionals/special-topics/health-apps/index.html>. We are not a HIPPA Business Associate. We follow HIPAA regulations closely and make sure your data is dealt privately and securely.

WHAT INFORMATION IS COLLECTED

When you use the Services, we may collect several types of information about you and/or your use of the Services. For example, we may collect information that you provide to us, information that we collect through your use of the Services, and information that we collect from publicly available sources or third parties.

Information You Provide to Us. There are a number of circumstances in which you may be required or invited to supply us with personal information, such as when you: enter your wellness and health data, subscribe to our publications, newsletters, and other content; create a log in or register for any of our Services; create a profile; user an interactive feature; participate in a community forum; register for an event; place an order; interact with our bots or other interactive content; complete a survey or participate in market research; enter a contest; submit content or post a comment; participate in a sweepstakes, contest, or game; seek employment at LGF; contact customer service; or send us an email, pitch, or request for information. In these circumstances, we may ask you to provide information such as your name, e-mail address, year of birth, gender, street address, employment information, or other demographic information.

Information About Your Use of the Services. We may collect information about your use of the Services such as:

Device information: We may collect your computer or mobile device model, IP address, other unique device identifiers, operating system version, browser type, language, and settings, and device type and settings.

Usage information: We may collect information about the Services you use, the time, date, and duration of your use of the Services, referral information, your interaction with content offered through the Services, search terms used, our referring website, and software crash reports. We also collect information stored using cookies, mobile ad identifiers, and similar technologies set on your device. Our servers may automatically keep an activity log of your use of the Services. We may collect such usage information at the individual or aggregate level.

Location information: We collect and store your device’s source IP address, which may disclose the general location of your device at the time you access the Services. Advertisements and certain content may be directed to you based on this data.

Information from Third Parties. We may receive information about you from third parties and combine it with information we receive from or about you. For example:

Information from social media websites: When you interact with any LGF property page or account on a social media platform, such as Facebook, Twitter, Tumblr, or LinkedIn, we may collect the personal information that you or the platform make available to us on that page or account, including your social media account ID and/or user name associated with that social media service, your profile picture, email address, friends list or information about the people and groups you are connected to and how you interact with them, and any information you have made public in connection with that social media service. The information we obtain depends on your privacy settings on the applicable social media service; we will comply with the privacy policies of the social media platform and we will only collect and store such personal information that we are permitted to collect by those social media platforms. When you access the Services through social media services or when you connect the Services to social media services, you are authorizing LGF to collect, store, and use such information and content in accordance with this Privacy and Data Policy.

Information from third party subscription providers and/or processors: When you purchase one of our subscription products (including without limitation ttData Membership) we receive personal information from the third parties that help us process subscriptions, as well as from any third party store from which you purchase a subscription (including the Apple Store). Please note that LGF does not receive (or collect, process, or store) any payment card industry (“PCI”) data.

Information from publicly or commercially available sources: Certain third parties make available information, collected both online and offline, such as demographic information, additional contact information, group affiliations, occupational information, and educational background.

Information from our affiliates: We may receive information from within our family of affiliated companies, including sharing of information LGF and ttData platform.

Other Information We Collect. We also may collect other information about you, your device, or your use of the Services in ways that we describe to you at the point of collection or otherwise with your consent. You may choose not to provide us with certain types of information but doing so may affect your experience in using the Services.

HOW WE USE YOUR INFORMATION

We use your information to help us personalize and continually improve your experience using the Services in the ways described below, as well as in other ways to which you consent or at your direction.

Providing the Services You Request. We use your information to process your subscriptions or memberships, enable you to login to some of the Sites, send you electronic newsletters, post content you submit, administer loyalty programs, and enable your participation in features of the Services. To enable us to provide these Services, we may use the information we collect to identify you across sessions, browsers, and/or devices.

Delivering Personalized Content and Recommendations. To make your experience more interesting and personalized, we may use any of the personal information we collect to assist us in delivering personalized and suggestions on any of our Services, including via email and text messaging, based on your interests and preferences. To enable us to provide these Services, we may use the information we collect to identify you across sessions, browsers, and/or devices.

Contacting You. We may send you (by email, text, or other medium): information about subscriptions, memberships, or other transactions, including information about upcoming renewals; editorial newsletters and content; offers or announcements about our products or features; offers or announcements about our third party partners’ products or services; communications about your comments or information submissions; online surveys; invitations to events; responses to your comments, inquiries, or requests; and legal notices, policy updates, and other important information about the Services. All editorial and commercial email messages include instructions for unsubscribing from such future communications.

Delivering Advertising. We may use your information to facilitate the delivery of targeted advertising (including interest-based advertising), promotions, and offers, on behalf of ourselves and our third party advertisers, both on our websites and elsewhere. Please see the “Third Parties” and “Privacy Choices” sections of this Privacy and Data Policy for further information about our and third parties’ use of cookies, web beacons, and other tracking technologies to provide you relevant ads, as well as information about how to disable cookies and make other choices related to targeted advertising. We may also use your information to measure and report on the delivery of advertisements.

Learning about Our Users and Services. We conduct research on our users’ demographics, interests and behavior, including performing statistical analysis of our users, their use of the Services, and their purchasing patterns. We do this to optimize and improve the Services, our products, and our operations. Allowing Social Sharing Functionality. If you log in with or connect a social media service account with a LGF Service, we may use your information to facilitate your sharing of information between the LGF Services and your social media service.

Protecting Our Rights and Others’ Rights. We may use your personal information as we believe is necessary to detect, investigate, and prevent activities that may violate our policies or may be illegal; to protect, enforce, or defend the legal rights, privacy, safety, or property of LGF, its employees, agents, or users; or as required by law.

We may use the information from one aspect of the Services for other aspects of Services, and we may combine information gathered from multiple aspects of the Services into a single user record. We also may use or combine information that we collect offline or we collect or receive from third-party sources for many reasons, including to enhance, expand, and check the accuracy of our records. Additionally, data collected from a particular computer, browser or device may be used with another computer, browser or device that is linked to the computer, browser or device on which such data was collected.

HOW WE SHARE YOUR INFORMATION

As described below, our information-sharing practices vary based on the type of information and the type of recipient.

Third Party Subscription Providers. If your subscription is provided in whole or in part by your employer or other third party, we may share with them information about your access and use of your subscription. If you have a subscription associated with a professor or school, we may notify your professor or school to confirm your subscription, access, or use. When providing this information, we may reveal limited amounts of your personal information such as your name or email address.

Third-Party Service Providers. Third party agents and vendors perform functions on our behalf, including, but not limited to, hosting, content syndication, content management tools, social media integration, marketing, analytics, product development or support, sending email or text messages, billing or payment processing, fulfilling orders, delivering subscriptions, auditing, and customer service. These entities may have access to personal information if needed to perform their functions. If such access is required, the third parties will be obligated to maintain the confidentiality and security of that personal information. They are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services to LGF.

Third Party Content or Advertising Partners. When you use our Services, third parties that provide content, advertising, or functionality to the Services, as well as social media services, may collect or receive information about you and/or your use of the Services, including through the use of cookies, beacons, and similar technologies. These third parties may use your information to provide you with advertising that is based on your interests and to measure and analyze ad performance, on our Services or other websites or platforms, and combine it with information collected across different websites, online services, and other devices. These third parties’ use of your information will be based on their own privacy policies.

Third Party Social Platforms. If you log in with or connect a social media service account with a LGF Service, you are authorizing us to share information we collect from and about you with the social media service provider, and you understand that the social media service’s use of the shared information will be governed by the social media service’s Privacy and Data Policy and on the privacy settings you have with the social media provider. If you do not want your Personal Data shared in this way, please do not connect your social media service account with your LGF account, and do not participate in social sharing on the Services.

Third Party Providers of Co-Branded Services. We may offer co-branded services or features, such as conferences, events, contests, sweepstakes, or other promotions together with a third party (“CoBranded Services”). These Co-Branded Services may be hosted by LGF or on the third party’s services. By virtue of these relationships, we may share the information you submit in connection with the CoBranded Service with the third party. The third party’s use of your information will be governed by the third party’s Privacy and Data Policy.

Aggregate or Anonymous Information. We also may share other information with third parties in a manner that does not identify particular users. For instance, we may share such information to help us determine how parts of Services are used, so that we may improve our services. We will also may share aggregate information with our partners and other third parties about how our users collective demographics or how they collectively use our Services. We also may share aggregate information with our partners about how many advertising impressions were delivered.

Users of the Services. Certain features of the Services, including the LGF App, give you an opportunity to interact with us and others. These may include the collaboration tools, community forums, chats, submitting a letter to the editor, creating community profiles, and rating, tagging, and commenting on articles. When you use these features, you should be aware that any information you choose to submit, including your name, user name, location, email address, profile information, picture or image, likes, status, and comments, including any political or religious or other beliefs you express, may be publicly available to anyone, including other users, search engines, advertisers, third party application developers, and anyone else with access to the Services. We are not responsible for any information you choose to submit and make public through these interactive features.

Assignment. In the event of a corporate change in control (for instance, a sale or merger), LGF may transfer your personal information to the new party in control or the party acquiring assets. In such circumstances, we would seek to ensure the acquiring party follows the practices described in this Privacy and Data Policy. We cannot promise, however, that an acquiring company or the merged company will have the same privacy practices or treat your information the same as described in this Privacy and Data Policy.

Law Enforcement, Legal Process, and Emergency Situations. In some cases, we may use or disclose your personal information to a third party if we are required to do so by law or if we in good faith believe that such action is necessary to comply with the law or legal process; to protect and defend our rights or to prevent misuse of our Services; or to protect the personal safety of our employees, agents, partners, the users of the Services, or the public.

With Your Consent or At Your Direction. In addition to the sharing described in this Privacy and Data Policy, we may share your information with third parties whenever you consent to or direct such sharing.

The Services may link to third-party websites and services that are outside our control. We are not responsible for the security or privacy of any information collected by these third parties, which operate pursuant to their respective privacy policies.

ONLINE TRACKING

When you use our Services, we and our third-party partners (which provide content, advertising, functionality, measurements, or analytics for our Services) may use cookies, web beacons, and other similar technologies to track your use of the Services.

What Are Cookies? Cookies are small text files that are stored in your device’s browser when you visit a website. Cookies make it possible to recognize you as the same user across one or more browsing sessions, and across one or more websites. We and third parties use cookies for a variety of purposes, including remembering your sign-in credentials and preferences so that you do not have to input them each time you use the Services; allowing us and third parties to customize your experience using the Services, including by determining the most relevant content and advertisements to show you on our websites and elsewhere online; and allowing us and third parties to monitor site traffic and performance, so that we may improve our Services and your experience.

What are Beacons? Web beacons (also called “web tags” or “pixels”) are tiny graphics or scripts that communicate information from your device to a server. Beacons can be embedded in online or mobile content, videos, advertisements, or emails. They allow a server to read certain types of information from your device, such as when you viewed the beacon (and thus the content in which it is embedded) and the IP address of the device on which you viewed the beacon. We and third parties use beacons for a variety of purposes, including to analyze the use of our Services and (in conjunction with cookies) to provide content and ads that are more relevant to you.

THIRD PARTIES

We rely on third parties to provide many features of our Services using data about your use of our Services and of other websites. These third parties may use cookies, web beacons, or other technologies to collect and process your personal data for the purposes of information storage and access; personalization of our Services; measurement of and analytics regarding the use of our Services; content selection, delivery, and reporting; and advertising selection, targeting, delivery, and reporting.

For instance, third party analytics services use cookies, web beacons, and other tracking technologies to collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website, in order to help us analyze how users interact with and use the Services, compile reports on the Services’ activity, and provide other data and insights related to the Services’ usage.

We also allow our third-party partners, third party ad serving networks, and unaffiliated advertisers (collectively, “Advertisers”) to use cookies, web beacons, and other tracking technologies to provide ads about goods and services that may be of interest to you. Advertisers may place a separate cookie on your computer, mobile device, or browser, or utilize other data collection and tracking technologies, to collect information such as your IP address, browser type, server being used, area code and zip code associated with your server, and whether you respond to particular ads. Advertisers may collect information about your online activities over time, across different computers, devices, and browsers, and across different websites and other online services. Advertisers may use this information to provide interest-based advertising or other targeted content. We may not have access to these cookies, although we may use statistical information arising from the cookies provided by these third parties to customize content and for the other purposes described above. Advertisers may also transfer this information to other parties where required to do so by law, or where such other parties process the information on their behalf.

We will not provide Advertisers with access to your name, address, e-mail address, or telephone number without your consent. Advertisers may use persistent identifiers, however, to track your internet usage across other websites in their networks beyond our Services. Though we restrict any attempts to re-identify this information, Advertisers may nonetheless be able to do so by combining information they collect about you when you use the Services with information about you obtained from other sources.

In general, the information collected and generated by third parties is processed and stored by the third parties and will be subject to their respective privacy policies (which we do not control and for which we are not responsible). We do not control these third parties’ tracking technologies or the information they may collect.

PRIVACY CHOICES

Turning Off Cookies. Most web browsers automatically accept cookies, but also usually allow you to modify your settings to disable or reject cookies. If you delete your cookies or if you set your web browser to decline cookies, however, some features of the Services may not work or may not work as designed. You can usually find these settings in the Options or Preferences menu of your browser; links to instructions provided by several of the most common browsers are below: Cookie settings in Google Chrome Cookie settings in Firefox Cookie settings in Internet Explorer Cookie settings in Safari web and iOS. Opting Out of Targeted Advertising. Many of the third-party advertisers that use tracking or targeting tools in connection with our Services either directly, or are members of programs that, offer you additional choices regarding the collection and use of your information. You can learn more about the options available to limit these third parties’ collection and use of your information by visiting their websites:

Opt Out of Interest Based Advertising (National Advertising Initiative)

Your Ad Choices (Digital Advertising Alliance)

Your Online Choices (European Interactive Digital Advertising Alliance)

About Facebook Ads and Facebook Privacy and Data Policy

The Services may deliver advertising using the vendor DoubleClick, a Google company. You can read about how DoubleClick uses cookies, use Google’s controls for blocking certain ads, or use Google’s Ad Settings Page to control how DoubleClick personalizes your ad experience. The Services may use Google Analytics to track your usage. If you wish to opt-out of Google Analytics’ tracking, use this browser add-on provided by Google.

Similarly, you can learn about your options to opt-out of mobile app tracking by certain advertising networks through your device settings. For more information about how to change these settings for Apple, Android or Windows devices, see:

Apple: <http://support.apple.com/kb/HT4228>

Android: <http://www.google.com/policies/technologies/ads/>

Windows: <http://choice.microsoft.com/en-US/opt-out>

Please note that opting-out of advertising networks’ tracking and targeting does not mean that you will not receive advertising while using our Services or on other websites, nor will it prevent the receipt of interest-based advertising from third parties that do not participate in these programs. It will exclude you, however, from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms.

Do Not Track. Your browser or device may include “Do Not Track” functionality. Because a “Do Not Track” compliance protocol has not yet been finalized, LGF’s information collection and disclosure practices, and the choices that we provide to customers, will continue to operate as described in this Privacy and Data Policy, whether or not a Do Not Track signal is received.

Opting out of Text Messages. You may opt out of receiving promotions or advertising via Text Message at any time, by replying “STOP” to one of our Text Messages.

Accessing your Information. You can request to access, review, correct, update, delete or modify your registration or subscription profile information (if such information exists) and modify your marketing preferences (where applicable) by contacting Privacy(at)lingear(dot)io. You may also access and/or update the information associated with your LGF Membership by visiting qz.com/account/membership. You may also access and/or update the information associated with your LGF App account by accessing the Setting feature within the App. Please note that if you have subscribed or registered for multiple of our Services or subscriptions, you may need to update your information for each account separately. Responding to Requests. For your protection, we may only implement requests with respect to the personal information 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. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions you began prior to requesting such change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the personal information provided until after the completion or cancelation of such purchase or promotion).

USERS IN THE EEA AND SWITZERLAND

If you are a resident of the EEA or Switzerland (an “EEA User”), the following information applies with respect to personal data collected through your use of our Services. Purposes of processing and legal basis for processing: We process personal data consistent with our disclosures in this Privacy and Data Policy. We process personal data on the following legal bases: (1) with your consent; (2) as necessary to perform our agreement to provide Services (such as when you subscribe to a newsletter); and (3) as necessary for our legitimate interests in providing the Services where those interests do not override your fundamental rights and freedoms related to data privacy.

All EEA Users of lingear.org (the “Site”) will see a personal data processing disclosure and consent interface (a persistent banner at the bottom of the screen). By using the Site, visitors agree to the use of cookies and some personal data by LGF and our partners for analytics, personalization, and ad targeting; please see the “Third Parties” section of this Policy for a list of our third-party data processing partners with which we have a direct relationship. Visitors preferring to use the Site without personalized advertising should toggle “Personalize ads” to “Off” at the top of this Policy. For any EEA User who toggles “Personalize ads” to “Off,” LGF will only serve non-personalized and nonprogrammatic advertising, which may be targeted using coarse location. An EEA User may manage her data usage preferences at any time by clicking “Manage Preferences” on our consent interface or by returning to this Privacy and Data Policy (and updating the “Personalize ads” setting at the top of the Policy). LGF’s mobile apps (LGF and LGF Brief), email communications, and other non-website Services do not process personal data for the purposes of ad targeting, selection, and delivery (either within or outside the Services). Transfers: Personal data we collect may be transferred to, and stored and processed in, the United States or any other country in which we or our affiliates or processors maintain facilities. We will ensure that transfers of personal data to a third country or an international organization are subject to appropriate safeguards. LGF is seeking approval from the Department of Commerce of its self-certification pursuant to its Privacy Shield Framework. Once final approval is received, this Policy will be updated with a link to LGF’s Privacy Shield Policy, which will govern use of personal information that has been transferred to us from organizations in the EEA and Switzerland.

Your Rights: You are entitled to the rights under Chapter III of the EU General Data Protection Regulation or Section 2 of the Swiss Federal Act on Data Protection with respect to the processing of your personal data, which include the right to access and rectify and to request erasure of personal data. To exercise these rights, contact Privacy(at)linkgear(dot)io and provide as complete a description of your request as possible.

OTHER IMPORTANT INFORMATION

How Your Information Is Secured. We take reasonable security measures to protect your information, including the use of physical, technical and administrative controls. Please understand, however, that while we try our best to safeguard your personal information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. You need to help protect the privacy of your own information. You must take precautions to protect the security of any personal information that you may transmit over any home networks, wireless routers, wireless (WiFi) networks or similar devices by using encryption and other techniques to prevent unauthorized persons from intercepting or receiving any of your personal information. You are responsible for the security of your information when using unencrypted, open access or otherwise unsecured networks.

How Long Your Information Is Stored. The time period for which we keep information varies according to the purpose for which it is used for. In some cases, there are legal requirements to keep data for a minimum period. Unless there is a specific legal requirement for us to keep the information, we will retain it for no longer than is necessary for the purposes for which the data was collected or for which it is to be further processed. Emails and Newsletters. You may always opt-out of receiving future e-mail marketing messages and newsletters from LGF by following the instructions contained within the emails and newsletters, or by e-mailing, calling, or writing us at the addresses in the “Questions” section of the Privacy and Data Policy below.

Contests, Sweepstakes or Games. When we run a contest, sweepstakes, or game relating to the Services, it will be accompanied by a set of rules. The rules for each contest, sweepstakes or game will specify how the information gathered from you for entry will be used and disclosed if it is different than as described in this Privacy and Data Policy. In conjunction with your entry in such contest or sweepstakes, personal information will be collected only if you voluntarily submit it.

Collection of Personal Financial Information by a Payment Service. When you purchase a subscription to one of our products (including LGF Membership and LGF Private Key), we may use an unaffiliated payment service to allow you to purchase a product or make payments (a “Payment Service”). Any information that you provide to a Payment Service will be subject to the applicable Payment Service’s Privacy and Data Policy, rather than this Privacy and Data Policy. We have no control over, and are not responsible for, any Payment Service’s use of information collected through any Payment Service. LGF does not itself receive (or collect, process, or store) any payment card industry (“PCI”) data.

Children’s Information. The Services are not intended for children under 13 years of age. LGF does not knowingly collect personal information from children under 13 years of age. If you are under 13 years of age, do not provide personal information to LGF without providing us with consent from your parents. If LGF discovers that a child under the age of 13 has provided LGF with personal information and we do not have parental consent, LGF will immediately delete that child’s information. If you believe that company has been provided with the personal information of a child under the age of 13 without parental consent, please notify us immediately at Privacy(at)linkgear(dot)io.

Your California Privacy Rights. LGF does not disclose your personal information to third parties for the third parties’ direct marketing purposes unless you affirmatively agree to such disclosures.

QUESTIONS

If you have questions about our Privacy and Data Policy, please contact us at:

ATTN: General Counsel

Linkgear Foundation LLC,

6710A Rockledge Drive, Ste 400

Bethesda, MD 20817

Phone: (202) 455-6608

Email: Privacy(at)linkgear(dot)i