

## PRIVACY POLICY

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Welcome to [ideaevolver.com](http://ideaevolver.com) (the "Site"). The Site is owned and operated by Idea-Evolver, LLC., a Pennsylvania limited liability company that provides audience marketing and custom software development services ("Company"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this Privacy Policy, or our practices with regards to your personal information, please contact us at [privacy@idea-evolver.com](mailto:privacy@idea-evolver.com).

When you visit the Site, you may provide us with your personal information. In this Privacy Policy, we seek to clearly explain to you what personal information we collect on or through the Site, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of the Site immediately.

Please read this Privacy Policy carefully as it will help you understand what we do with personal information that we collect.

### PERSONAL INFORMATION WE COLLECT

We collect personal information that you voluntarily provide to us when you visit the Site.

The personal information that we collect depends on the context of your interactions with us and the Site, the choices you make and the features you use. The personal information we collect may include the following:

#### Personal information you provide to us.

We collect personal information that you provide to us in connection with your use of the Site, such as your email address if you wish to receive email messages from us. We may use this personal information to communicate with you, screen for potential risk or fraud, personalize your experience on the Site, and, when in line with the preferences you have shared with us, provide you with information or advertising relating to our services.

#### Information we collect automatically

We may automatically collect certain information when you visit, use or navigate the Site. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use the Site and other technical information. We may collect such automatically generated or collected information through a variety of tracking technologies, including cookies, Flash objects, web beacons, embedded scripts, mobile SDKs, location-identifying technologies and similar technology ("tracking technologies"), and we may use third-party partners or services to assist with this effort. Information we collect automatically about you or your device may be combined with other personal information we collect directly.

While such automatically generated or collected information is primarily needed to maintain the security and operation of the Site, and for our internal analytics and reporting purposes, we, or the third-party partners we use, may also use information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the Site; (b) provide custom, personalized content and information to you; (c) identify and contact you across multiple devices; (d) provide and monitor the effectiveness of the Site; (e) perform analytics and detect usage patterns on the Site; (f) diagnose or fix technology problems; (g) detect or prevent fraud or other harmful activities, and (h) otherwise plan for and enhance the Site and for other internal purposes.

### DISCLOSURE OF PERSONAL INFORMATION

We may process or share your personal information that we hold based on or more of the following legal bases:

- **Consent:** We may process your personal information if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your personal information when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your personal information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your personal information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of assets, financing, or acquisition of all or a portion of our organization to another party.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates would include a parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us, if any.
- **Business Partners.** We may share your personal information with our business partners to offer you certain products, services or promotions.

## INTERNATIONAL TRANSFERS

Our servers are located in the United States of America. If you are accessing the Site from outside of the United States of America, please be aware that your personal information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see the section headed "DISCLOSURE OF PERSONAL INFORMATION" above), in the United States of America and other countries.

If you are a resident of a country other than the United States of America, including countries within the European Economic Area, then we may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this Privacy Policy and applicable law.

## RETENTION OF PERSONAL INFORMATION

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal

requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **SECURITY**

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your personal information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your personal information. Although we will do our best to protect your personal information, transmission of personal information to and from the Site is at your own risk. You should only access the Site within a secure environment.

## **MINORS**

We do not knowingly solicit personal information from or market to individuals under 18 years of age. By using the Site, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Site.

## **THIRD PARTY WEBSITES**

The Site may contain links to third party websites and applications of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the Site, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot protect the safety and privacy of information that you provide to a third party outside of the Site. Before visiting and providing any information to any third party websites or applications, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website or application, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Site.

## **YOUR PRIVACY RIGHTS**

In some regions, you have certain rights under applicable data protection laws. These may include the right (a) to request access and obtain a copy of your personal information, (b) to request rectification or erasure of your personal information; (c) to restrict the processing of your personal information; and (d) if applicable, to data portability with respect to your personal information. In certain circumstances, you may also have the right to object to the processing of your personal information. To make a request related to the exercise of those rights, please contact us at [privacy@idea-evolver.com](mailto:privacy@idea-evolver.com). We will consider and act upon any verifiable request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have questions, requests or comments about your privacy rights, please contact us at [privacy@idea-evolver.com](mailto:privacy@idea-evolver.com).

**Cookies and similar technologies:** Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of the Site.

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list, however, we may still communicate with you, for example to send you service-related emails, to respond to your requests or for other non-marketing purposes. To otherwise opt-out, you may email us at [privacy@idea-evolver.com](mailto:privacy@idea-evolver.com).

## **DO-NOT-TRACK**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

## **MODIFICATIONS**

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Last Revised" date and the updated version will be effective as of that date. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your personal information. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Site after the date such revised Privacy Policy is posted.

## **REVIEWING, UPDATING OR DELETING YOUR PERSONAL INFORMATION**

Based on the applicable laws of your jurisdiction, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request by contacting us as indicated in the section headed "HOW TO CONTACT US" below. We will respond to your request within 30 days.

## **HOW TO CONTACT US**

If you have questions, requests or comments about this Privacy Policy please contact us at:

Idea-Evolver, LLC, 1315 Walnut Street, Suite 932, Philadelphia, PA 19107, Attention: Privacy Officer  
email: [privacy@idea-evolver.com](mailto:privacy@idea-evolver.com).