

# Privacy Policy

## Privacy Policy

**Last Revised: December 31, 2019**

This privacy policy explains how Information Clearinghouse, Inc. dba Creditntell (“Information Clearinghouse,” “we” or “us”) collects, uses and discloses information about you when you use our websites, applications, and other online services (collectively, the “Services”), when you attend our events or when you otherwise interact with us as described below.

## Revisions to this Privacy Policy

We may change this policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy, and in some cases, we may provide you with additional notice (such as by adding a statement to our website homepage or by sending an email notification). We encourage you to review this policy whenever you access the Services to stay informed about our information practices and the choices available to you.

## Collection of Personal Information

In this Privacy Policy, "**personal information**" means any information that identifies, relates to, describes, is reasonably capable of being associated with or reasonably can be used to identify an individual or household and other data that is linked to personal information.

The types of personal information we collect about you depend on your interactions with us and are described in more detail below.

### Personal Information You Provide Directly to Us

We collect personal information you provide directly to us. For example, we collect information when you create an account to access or use the Services, access or use any collaboration tools or participate in any interactive features of the Services, send us an email, fill out a form, respond to a survey, comment on a blog, register for or participate in an event, apply for a job, interact with us on social media, enter a promotional drawing, or otherwise communicate with us.

The types of personal information we may collect include your:

- Contact information, such as name, email address, postal address, and phone number;
- Employment information, such as business unit/division, company name, job status, job title, and office location; and
- Any other information you choose to provide.

## Personal Information We Collect Automatically

We automatically collect personal information when you access or use the Services. The types of information we collect may include:

- **Log Information:** We collect log information about your use of the Services, including your browser type and language, app version, access times, pages viewed, Internet Protocol (“IP”) address, approximate geographic location, and the webpage or online service you visited before navigating to the Services.
- **Device Information:** We collect information about the device you use to access our applications, including the hardware model, operating system and version, unique device identifiers, and network information.
- **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers use various technologies to collect information, including cookies and web beacons (or pixel tags). Cookies are small data files stored on your hard drive or in device memory that help us to, among other things, improve the Services and your experience, see which areas and features of the Services are popular and count visits. Web beacons are clear, electronic images that may be used on the Services or in our emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine if an email has been opened and acted upon.

## Personal Information We Derive

We may derive information or draw inferences about you based on the other types of personal information we collect. For example, we may infer your location based on your IP address, or that you are interested in employment or participating in an event based on your browsing behavior on our Services.

## Use of Personal Information

We use personal information for various purposes, including to:

- Operate and improve the Services;
- Respond to your questions, comments and requests;
- Provide the information or services you request and send you related information, including confirmations and receipts;
- Send you newsletters and updates;
- Communicate with you about our services, programming and events, and other information we think will be of interest to you;
- Assess job applicants and make hiring decisions;
- Monitor and analyze usage, trends, and activities related to the Services;
- Manage your online account(s) and send you technical notices, updates, security alerts, and support and administrative messages; and
- Notify you about any changes to the Services.

We may process and store your personal information in the United States and other countries, which may have less-protective data protection laws than the region in which you are situated.

## Disclosure of Personal Information

We may share your personal information as follows or as otherwise described in this Privacy Policy:

- With vendors, consultants, professional advisors, and other service providers (collectively, “Service Providers”) working on our behalf and needing access to your personal information to carry out their work for us.
- In connection with, or during negotiations of, any merger, sale of Information Clearinghouse’s assets, financing or acquisition of all or a portion of our business to another company;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of us or any third party; and
- With your consent or at your direction, including if we notify you that your personal information will be shared in a particular manner and you provide such personal information. We may also share your personal information with third parties when you intentionally direct us to do so or when you use our Services to intentionally interact with third parties. We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

## Advertising and Analytics Services Provided by Others

We may allow others to provide analytics services and serve advertisements on our behalf across the web and in applications. These entities may use cookies, web beacons, device identifiers, and other tracking technologies which collect information about your use of the Services and other websites and applications. This information may be used by Information Clearinghouse and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interest on our Services and other websites, and better understand your online activity.

If you would like more information about this practice or to opt-out of this use of your anonymous information, please visit <http://www.networkadvertising.org>. Your device may also include a feature (“Limit Ad Tracking” on iOS or “Opt Out of Interest-Based Ads” or “Opt Out of Ads Personalization” on Android) that allows you to opt out of having certain information collected through apps used for behavioral advertising purposes.

## Data Security

Although we employ reasonable security measures, the transmission of information via the internet is not completely secure or private. If you have any questions about the security of personal information we collect, please contact: [support@creditntell.com](mailto:support@creditntell.com)

## Data Transfers

For the reasons and purposes set forth in this Privacy Policy, the personal information we collect may be transferred to, stored, or otherwise processed in the United States, Canada and other locations. We also transfer personal information to service providers that process personal information for us in the United States, Canada and other locations (as an example, Rackspace process information for us in various data center locations, including those listed at <https://www.rackspace.com/about/data-centers>). While in another jurisdiction for processing, your personal information may be accessed by the courts, law enforcement, and national security authorities of that jurisdiction. These jurisdictions may not provide the same level of data protection as your home jurisdiction.

## Children's Privacy

The Services are not intended for children under the age of 18. Information Clearinghouse does not target our Services to children under 18 or knowingly collect information from children under the age of 18.

## Links to Other Websites and Third-Party Content

We may provide links to or embed videos hosted by third-party websites, services, and applications, such as YouTube, that are not operated or controlled by Information Clearinghouse. This Privacy Policy does not apply to third-party services, and we cannot take responsibility for the content, privacy policies, or practices of third-party services. We encourage you to review the privacy policies of any third-party service before providing any information to or through them. The Services may include an activity feed, social media buttons and widgets, such as the Facebook "Like" button or the "Share This" button. Your interactions with these features are governed by the privacy policy of the third-party service that provides the feature.

## Your Choices

You have certain choices with respect to how we treat your personal information, as described below.

### Correction

You may review and request modifications to your personal information by contacting us at [support@creditntell.com](mailto:support@creditntell.com).

### Marketing Communications

You may opt out of receiving promotional communications from us or request changes to your communication preferences by following the instructions in those

communications. If you opt out, we may still send you non-promotional communications, such as those about your account or our ongoing business relations.

### Push Notifications/Alerts

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

### Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove or reject cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

## Information for European Economic Area Residents

If you are a resident of the European Economic Area (“EEA”), you have certain rights and protections under applicable law regarding the processing of your personal information. The term “personal information” has the meaning given to it by the European General Data Protection Regulation (“GDPR”). When we process your personal information as described in this Privacy Policy, we will only do so when we have a legitimate interest in processing your personal information (for example, our legitimate interest in providing the Services, responding to your inquiries, or sending you marketing communications), when the processing is necessary for the performance of a contract between you and us (for example, to provide you with legal services), when the processing is necessary for compliance with a legal obligation to which we are subject, or when we have your consent to process your personal information. When processing is based on consent, you have the right to revoke such consent at any time. You also have the right to access personal information we hold about you and to ask that your personal information be corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, you may contact us as indicated below. If you have a concern about our processing of personal information that we are not able to resolve, you have the right to lodge a complaint with the data privacy authority where you reside. For contact details of your local Data Protection Authority, please see: [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm).

## Information for California Consumers: Your California Privacy Rights

Additional Disclosures Related to Collection, Use, and Disclosure of Personal Information

If you are a California consumer, the California Consumer Privacy Act (“CCPA”) requires us to disclose the following information with respect to our collection, use, and disclosure of personal information.

- **Categories of Personal Information Collected:** In the preceding 12 months, we have collected the following categories of personal information: identifiers, characteristics of protected classifications under California or U.S. law, professional and employment-related information, education information, commercial information, internet and electronic network activity, inferences drawn about your preferences, and other categories of personal information that relates to or is reasonably capable of being associated with you. For examples of the precise data points we collect, please see “Collection of Personal Information” above.
- **Business or Commercial Purpose for Collecting and Using Data:** We collect personal information for the business purposes described in the “Use of Personal Information” section above.
- **Categories of Sources of Personal Information:** We collect personal information from you and the sources described in the “Personal Information We Collect From Other Sources” section above.
- **Categories of Personal Information Disclosed:** In the preceding 12 months, we have disclosed the following categories of personal information for business or commercial purposes: identifiers, characteristics of protected classifications under California or U.S. law, professional and employment-related information, education information, commercial information, internet and electronic network activity, inferences drawn about your preferences, and other categories of personal information that relates to or is reasonably capable of being associated with you.
- **Categories of Third Parties With Whom We Share Personal Information:** We may share your personal information with the third parties as described in the “Disclosure of Personal Information” section above.
- **Sale of Personal Information (as defined by the CCPA):** We do not sell the personal information we collect.

## Your Consumer Rights

California consumers have the right to request access to their personal information, additional details about our information practices, and deletion of their personal information (subject to certain exceptions). California consumers also have the right to opt out of sales of personal information, if applicable. California consumers may make a rights request by calling 1-800-789-0123 or emailing [support@creditntell.com](mailto:support@creditntell.com). Once we receive your request, we may verify it by requesting information sufficient to confirm your identity. If you would like to use an authorized agent registered with the California Secretary of State to exercise your rights, we may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to submit requests on your behalf. We will not discriminate against you if you choose to exercise your rights under the CCPA.

## Contact Us

If you have any questions or comments about this Privacy Policy, you may call us at 1-800-789-0123 or email [support@creditntell.com](mailto:support@creditntell.com).