

## PRIVACY POLICY

*Last Updated: 3/6/18*

### Introduction

This policy (“**Privacy Policy**”) describes the practices of Hyphen-Labs Inc. (“**Hyphen-Labs**,” “**Company**,” “**we**” or “**us**”) for collecting, using, maintaining, and disclosing information that we collect from you or that you provide to us when you visit our website (our “**Site**”), or use any other products or services made available by us (collectively with the Site, the “**Services**”).

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. The use of information collected through our Services shall be limited to the purposes described under this Privacy Policy and our Terms of Use located at <http://www.hyphen-labs.com/assets/-hyphen-labs--privacy-policy.pdf> (or other relevant customer contracts). By accessing or using the Services, you agree to this Privacy Policy. If you are using the Services on behalf of an entity, you are agreeing to this Privacy Policy for that entity and are representing to us that you have the authority to do so (in which case “**you**” will refer to that entity). If you do not agree with our policies and practices, your choice is not to use the Services.

This Privacy Policy may change from time to time. If we make any changes, we will post the changes on this page and indicate at the top of this page the date the policy was last revised. We may also notify you of any material changes either through a pop-up notice, e-mail or through other reasonable means. Any such changes are effective immediately when we post them and apply to all access to and use of the Services thereafter. Your continued use of the Services after the date any such changes become effective constitutes your acceptance of the new policy.

### Information We Collect and How We Collect Information

The information we collect from you falls into two categories: personally identifiable information (*e.g.*, your name and e-mail address) (“**Personal Information**”) and non-personally identifiable information (*i.e.*, information that cannot be used to identify who you are) (“**Non-Personal Information**”). Below are the various ways in which we may collect Personal Information and Non-Personal information from you.

**Information We Automatically Collect.** We and third-party service providers acting on our behalf, which may include third-party analytics service providers and third-party advertisers, may incorporate technology such as “pixel tags,” “web beacons,” and “cookies” that allow us to track the actions of users of our Services automatically. For example, we may automatically collect information about your location, your internet connection, your browser, when you access the Services, the website address that linked you to our Site, the website that you visit after using our Services, and details

of how you used our Services, such as how often you used our Services and which features of the Services you used.

**Third-Party Information Collection.** When you use the Services, certain third parties may use cookies or other automatic information collection technologies to collect information, including Personal Information, about you and your online activities over time and across different websites. We do not control these third parties' tracking technologies or how they may be used. If you have questions about their data collection practices, you should review the privacy policies of those third parties or contact them directly.

**Publicly Posted.** If you post information on public areas of the Site or on any site through which our Services are offered and sold (*i.e.*, comments or blog), that information is visible to and may be collected, stored and used by anyone. By posting information, you agree that you have obtained all necessary consents to make such information public and that doing so will not violate any laws. If you remove information that you have made public through or related to our Services, copies may remain viewable in cached and archived pages of our Services or if other users have copied or saved that information. We are not responsible for the actions of any third parties with whom you share Personal Information.

**Information You Voluntarily Provide to Us.** If you contact us by phone, email, instant message, live chat, social media, or by some other means, or if you sign up for our newsletter, we may keep a record of your contact information (including your name, company name, email, address and phone number) and the correspondence. When we send you emails, we may also track whether you open them to determine how to deliver more helpful emails and improve our Services.

**Information Collected Through Use of the Services.** If you use our Services, we may collect information about how you use and interact with the Services and the data and information that is collected or provided by you through or in connection with your use of the Services.

### **How We Use Your Information**

We may use information that we collect about you or that you provide to us, including Personal Information, to measure usage of the Services, to analyze the effectiveness of our Services, to conduct research, to improve and enhance functionality of the Services, to provide support for the Services and respond to requests and inquiries, to provide you with notices, such as updates or changes that we may make to the Services, to provide you with our newsletter and to market and advertise the Services, including through promotional e-mail messages, directly or in partnership with other parties, and by displaying our advertisements on other websites that you visit or use. We may also use this information to offer you targeted advertising in order to personalize your experience by showing you advertisements for products and

services that are more likely to appeal to you (a practice known as behavioral advertising).

We may from time to time aggregate information in certain data analysis, reports, or other interpretations of trends for both internal and external purposes.

Personal Information will be retained only for as long as it serves a purpose consistent with the expectations of the reasonable user given the context of the collection. Non-Personal Information may be stored indefinitely.

### **Disclosure of Your Information**

We may disclose your Personal Information and Non-Personal Information to service providers or other third parties, such as vendors, technical agents, subcontractors and consultants, to perform certain business-related functions that help make the Services and our offerings available and functional, including, but not limited to, design services, installation services, web site hosting, data analysis and metrics services, maintenance and technical services, customer service and support, email delivery services, infrastructure services and to help us in our marketing efforts, including managing and delivering contextual and tailored advertisements.

We may also use the information we collect to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria. We do not actively share Personal Information with third-party advertisers for their direct marketing purposes unless you give us your consent. In addition, we may disclose your Personal Information and Non-Personal Information to a buyer or other successor as part of a merger, acquisition, change of control or other similar business transfer, to government body or other third party if required to do so by law or in the good faith belief that such action is necessary to comply with a legal obligation, or in specific other cases with your consent.

We may disclose aggregated user statistics and other data with our affiliates, agents and current or prospective business partners. This aggregate information does not personally identify you.

The Services may allow you to post information to various third-party services or platforms, such as social networking services like Instagram, Twitter and Facebook. You acknowledge that if you choose to use this feature, your friends, followers and subscribers on these third party services or platforms will be able to view such activity. The use of the information by such social networking websites will be governed by their privacy policies, and we do not control their use of the shared data.

**Required Disclosures of Information.** Hyphen-Labs will disclose your information where required to do so by law, if subject to subpoena or other legal proceeding or if

we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use or to protect the security or integrity of our Services; and/or (c) to exercise or protect the rights, property, or personal safety of Hyphen-Labs, our users or others.

**Disclosures During a Change of Control.** We may buy or sell/divest/transfer Company (including any shares in Company), or any combination of its products, services, assets and/or businesses. Your information such as customer names and email addresses, and other user information related to our Services may be among the items sold or otherwise transferred in these types of transactions. We may also sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of Company. You will be notified via email and/or a prominent notice on our Site of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

### **Choices About How We Collect, Use and Disclose Your Information**

We strive to provide you with choices regarding our collection, use and disclosure of the information you provide to us. The mechanisms listed below aim to provide you with control over such collection, use and disclosure:

**Marketing Communication; Newsletter.** If you do not want us to send you marketing or promotional communications, including if you have signed up for our newsletter and you no longer want to receive it, you can opt-out by emailing us at [privacy@hyphen-labs.com](mailto:privacy@hyphen-labs.com) .

**Cookies.** You have the option to accept or disable cookies at any time through your browser. You may refuse to accept browser cookies by activating the appropriate setting on your browser. If you choose to disable your cookies, your user experience may be limited.

**Google Analytics.** You can opt out of tracking by Google Analytics by using Google's Ads Settings or going to <https://tools.google.com/dlpage/gaoptout/>. You may also opt out of Google marketing products, but please note that this does not opt you out of being served generic ads.

**Third-Party Advertising.** If you are interested in more information about tailored advertising and your choices to prevent third parties from delivering tailored web advertisements, you may visit the following websites: <http://www.networkadvertising.org/choices/> or <http://www.aboutads.info/choices/>. These opt-out tools are provided by third parties. We do not control or operate these tools or the choices that advertisers and others provide through these tools. Please note that you may still receive advertisements from third parties within our Services even

if you opt out of tailored advertising but they will not be based on your activity across unrelated web sites.

**Do Not Track Signals.** Third parties may keep track of your browsing activities across third party websites. California Business and Professions Code Section 22575(b) provides that California residents are entitled to know we respond to “Do Not Track” browser signals. Certain web browsers enable users to activate a “Do Not Track” signal but we do not currently respond to the “Do Not Track” signal or other similar mechanisms.

### **Accessing and Correcting Your Information**

If you wish to access, update, correct or delete any Personal Information in our possession that you have previously submitted via the Services, please contact us at [privacy@hyphen-labs.com](mailto:privacy@hyphen-labs.com) . We do not guarantee that any Personal Information can be removed completely.

### **Third Parties; Links to Third Party Sites**

This Privacy Policy applies only to the Services. The Services may contain advertisements or links to other web sites not operated or controlled by us (the “Third Party Sites”), and the policies and procedures described in this Privacy Policy do not apply to those Third Party Sites, even if you access them through the Services. The links from the Services do not imply that we endorse or have reviewed the Third Party Sites. We encourage you to carefully review the privacy policies of any Third Party Sites you access so you know how they will use and share your information.

### **Children Under the Age of 13**

Our Services are intended for users who are 18 years of age and older. If you are under the age of 13, you are not permitted to submit any Personal Information to us. If you believe we might have any information from or about a child under 13, please contact us at [privacy@hyphen-labs.com](mailto:privacy@hyphen-labs.com) .

### **Data Retention**

We strive to keep your information only as long as we need it for legitimate business purposes and as permitted by applicable legal requirements. If you close your account, we will retain certain data for analytical purposes and recordkeeping integrity, as well as to prevent fraud, enforce our Terms of Use, take actions we deem necessary to protect the integrity of our Services or our users, or take other actions otherwise permitted by law. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties’ policies.

You acknowledge that Hyphen-Labs may establish general practices and limits concerning use of the Services, including without limitation the maximum period of

time that data or other content will be retained by the Services and the maximum storage space that will be allotted on Hyphen-Labs's servers on your behalf. You agree that Hyphen-Labs has no responsibility or liability for the deletion or failure to store any data or other content maintained or uploaded by the Services. You further acknowledge that Hyphen-Labs reserves the right to change these general practices and limits at any time, in its sole discretion. We will endeavor to give you notice of any such change where required by applicable law.

### **Storage and Processing in Other Jurisdictions**

Personal Information collected through the Services may be stored and processed in the United States or any other country in which Hyphen-Labs or its subsidiaries, affiliates, or service providers maintain facilities. If you are located in the European Union or other jurisdictions with laws governing data collection and protection that differ from U.S. law, you acknowledge that we may transfer Personal Information to a country or jurisdiction that has different data protection laws than the data protection laws of the country in which you reside and you expressly consent to the transfer of information, including Personal Information, to the United States or any other country in which Hyphen-Labs or its subsidiaries, affiliates or service providers maintain facilities.

### **Security**

We take reasonable steps to protect the Personal Information provided to us from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from the Services may not be secure. Therefore, you should take special care in deciding what information you send to us via e-mail. Please keep this in mind when disclosing any Personal Information to us via the Internet. In the event that Personal Information is compromised as a breach of security, Hyphen-Labs will promptly notify our customers in compliance with applicable law.

### **Contact Information**

If you have any questions about this Privacy Policy, please contact us at [privacy@hyphen-labs.com](mailto:privacy@hyphen-labs.com) .