

# Privacy Policy

*Effective starting: May 25, 2018*

## What this policy covers

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- What information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- How to access and control your information
- How we transfer information we collect internationally
- Other important privacy information

This Privacy Policy covers the information we collect about you when you use our products or services, or otherwise interact with us (for example, by attending our events), unless a different policy is displayed. Imagineer, we and us refers to Imagineer Technology Group LLC and any of our corporate affiliates. We offer several products, namely Clienteer, FundInsight, Synap, and WebVision, in the cloud or on our clients' servers, along with professional services to support our clients. We refer to all of these products, together with our other services and websites as "Services" in this policy.

This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. **If you do not agree with this policy, do not access or use our Services or interact with any other aspect of our business.**

Where we provide the Services under contract with an organization (for example your employer) that organization controls the information processed by the Services. For more information, please see Notice to End Users below.

## **What information we collect about you**

We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

### **Information you provide to us**

We collect information about you when you input it into the Services or otherwise provide it directly to us.

***Account and Profile Information:*** We collect information about you when you register for an account, create or modify your profile, set preferences, sign-up for or make purchases through the Services. For example, you provide your contact information and, in some cases, billing information when you sign up or register for the Services. You also have the option of adding a display name, profile photo, job title, and other details to your profile information to be displayed in our Services. We keep track of your preferences when you select settings within the Services.

***Content you provide through our products:*** The Services include the Imagineer products you use, where we collect and store content that you post, send, receive and share. This content includes any information about you that you may choose to include. If you use our Services on your own network, we do not host, store, transmit, receive or collect information about you (including your content), except in limited cases, where permitted by your administrator: we collect feedback you provide directly to us through the product such as error logs or suggestions and; we collect content using analytics techniques that hash, filter or otherwise scrub the information to exclude information that might identify you or your organization; and we collect clickstream data about how you interact with and use features in the Services. Server and data center

administrators can disable our collection of this information from the Services via the administrator settings or prevent this information from being shared with us by blocking transmission at the local network level.

***Content you provide through our websites:*** The Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.

***Information you provide through our support channels:*** The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

***Payment Information:*** We collect certain payment and billing information when you register for certain paid Services. For example, we ask you to designate a billing representative, including name and contact information, upon registration. You might also provide payment information, such as payment card details, which we collect via secure payment processing services.

### **Information we collect automatically when you use the Services**

We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

***Your use of the Services:*** We keep track of certain information about you when you visit and interact with any of our Services. This information includes the features you use and the links you click on. If you use a server or data center version of the Services, the information we collect about your use of the Services is limited to clickstream data about how you interact with and use features in the Services, in addition to content-related information described in "Content you provide through our products," above. Server and data center administrators can disable our collection of this information from the

Services via the administrator settings or prevent this information from being shared with us by blocking transmission at the local network level.

***Device and Connection Information:*** We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you install, access, update, or use our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services. Server and data center Service administrators can disable collection of this information via the administrator settings or prevent this information from being shared with us by blocking transmission at the local network level.

***Cookies and Other Tracking Technologies:*** Imagineer and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. For more information, please see our Cookies and Tracking Notice, which includes information on how to control or opt out of these cookies and tracking technologies.

#### **Information we receive from other sources**

We receive information about you from other Service users, from third-party services, from our related companies, and from our business and channel partners.

***Other services you link to your account:*** We receive information about you when you or your administrator integrate or link a third-party service with our Services. You or your administrator integrate our Services with other services you use, such as your email services, Office 365, Gmail, or Slack to allow you to access, store, share and edit certain content from a third-party through our Services. You may authorize our Services to sync a contact list or address book so that you can easily connect with those contacts within the Services or invite them to collaborate with you on our Services. The information we receive when you link or integrate our Services with a third-party service

depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.

***Other Partners:*** We may receive information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Services and online advertisements.

## **How we use information we collect**

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

***To provide the Services and personalize your experience:*** We use information about you to provide the Services to you, including to process transactions with you, authenticate you when you log in, provide customer support, and operate and maintain the Services.

***For research and development:*** We are always looking for ways to make our Services smarter, faster, secure, integrated, and useful to you. We use collective learnings about how people use our Services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Services. For example, knowing which features are most actively used, allows us to improve the placement of those features to be more prominent and easier to access.

***To communicate with you about the Services:*** We use your contact information to send transactional communications via email and within the Services, including confirming your purchases, sending you invoices, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. We also provide tailored communications

based on your activity and interactions with us. For example, certain actions you take in the Services may automatically trigger a feature or third-party app suggestion within the Services that would make that task easier, or allows us to remove you from a certain communication channel. We also send you communications as you are using a particular Service to help you become more proficient in using that Service, such as helpful tips and release notes. Sometimes these communications are part of the Services and you cannot opt out of them. If an opt out is available, you will find that option within the communication itself.

***To market, promote and drive engagement with the Services:*** We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email and by displaying Imagineer ads on other companies' websites and applications, as well as on platforms like LinkedIn and Google. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers, promotions and contests. You can control whether you receive these communications as described below under "Opt-out of communications."

***Customer support:*** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services.

***For safety and security:*** We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

***To protect our legitimate business interests and legal rights:*** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

***With your consent:*** We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

***Legal bases for processing (for EEA users):***

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

## **How we share information we collect**

We make relationship management and reporting tools, and we want them to work well for you. This means sharing information through the Services and with certain third parties. We share information we collect about you in the ways discussed below, including in connection with possible business transfers, **but we are not in the business of selling information about you to advertisers or other third parties.**

## **Sharing with other Service users**

When you use the Services, we share certain information about you with other Service users.

***For collaboration:*** You can create content, which may contain information about you, and grant permission to others to see, share, edit, copy and download that content based on settings you or your administrator (if applicable) select. Some of the collaboration features of the Services display some or all of your profile information to other Service users when you share or interact with specific content. Please be aware that some aspects of the Services like WebVision web pages can be made publicly available, meaning any content posted, including information about you, can be publicly viewed and indexed by and returned in search results of search engines. You can confirm whether certain Service properties are publicly visible from within the Services or by contacting the relevant administrator.

***Managed accounts and administrators:*** If you register or access the Services using an email address with a domain that is owned by your employer or organization, and such organization wishes to establish an account or site, certain information about you including your name, profile picture, contact info, content and past use of your account may become accessible to that organization's administrator and other Service users sharing the same domain. If you are an administrator for a particular site or group of users within the Services, we may share your contact information with current or past Service users, for the purpose of facilitating Service-related requests.

## **Sharing with third parties**

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services.

***Service Providers:*** We work with third-party service providers to provide hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on



our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

***Imagineer Partners:*** We work with third parties who provide consulting, sales, and technical services to deliver and implement customer solutions around the Services. We may share your information with these third parties in connection with their services, such as to assist with billing and collections, to provide localized support, and to provide customizations. We may also share information with these third parties where you have agreed to that sharing.

***Links to Third Party Sites:*** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

***Social Media Widgets:*** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.

***With your consent:*** We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.

***Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:*** In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect Imagineer, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

***Business Transfers:*** We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information.

## **How we store and secure information we collect**

### **Information storage and security**

We use data hosting service providers in the United States to host the information we collect, and we use technical measures to secure your data. For more information on where we store your information, please see our Cloud hosting infrastructure page. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

If you use our server or data center Services, responsibility for securing storage and access to the information you put into the Services rests with you and not Imagineer. We strongly recommend that server or data center users configure SSL to prevent interception of data transmitted over networks and to restrict access to the databases and other storage points used.

### **How long we keep information**

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

***Account information:*** We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.

***Information you share on the Services:*** If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your team members or other users to make full use of the Services. For example, we continue to display content you provided.

***Managed accounts:*** If the Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account. For more information, see "Managed accounts and administrators" above.

***Marketing information:*** If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us or ceased using Imagineer Services. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

## **How to access and control your information**

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

### **Your Choices:**

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Where the Services are administered for you by an administrator at your firm, you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example, by installing third-party integrations, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

***Access and update your information:*** Our Services and related documentation give you the ability to access and update certain information about you from within the Service. For example, you can access your profile information from your account and search for content containing information about you using key word searches in the Service. You can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content.

***Deactivate your account:*** If you no longer wish to use our Services, your administrator at your firm may be able to deactivate your Services account. Please contact your administrator. If you are an administrator and are unable to deactivate an account through your administrator settings, please contact Imagineer Support. Please be aware that deactivating your account does not delete your information; your information remains visible to other Service users based on your past participation within the Services. For more information on how to delete your information, see below.

***Delete your information:*** Our Services and related documentation give you the ability to delete certain information about you from within the Service. For example, you can remove content that contains information about you using the key word search and editing tools associated with that content, and you can remove certain profile information within your profile settings. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

***Request that we stop using your information:*** In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third-party app, please disable the app or contact your administrator to do so.

***Opt out of communications:*** You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services. You can opt out of some notification messages in your account settings as they may be available.

***Turn off Cookie Controls:*** Relevant browser-based cookie controls are described in our Cookies & Tracking Notice.

***Send "Do Not Track" Signals:*** Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Services do not currently respond to browser DNT signals. You can use the range of other tools we provide to control data collection and use, including the ability to opt out of receiving marketing from us as described above.

***Data portability:*** Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and personal information. As it relates to other data captured within our product databases, content of the data is governed by our License and Support Agreements.

## **How we transfer information we collect internationally**

### **International transfers of information we collect**

We collect information globally and primarily store that information in the United States. We transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the Services. Whenever we transfer your information, we take steps to protect it.

***International transfers within the Imagineer Companies:*** To facilitate our global operations, we transfer information to United States and allow access to that information from countries in which Imagineer has operations for the purposes described in this policy. These countries may not have equivalent privacy and data protection laws to the laws of many of the countries where our customers and users are based. When we share information about you within Imagineer corporate affiliates, we make use of

standard contractual data protection clauses, which have been approved by the European Commission.

You may contact your local data protection authority within the European Economic Area or Switzerland (as applicable) for unresolved complaints.

We are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

## **Other important privacy information**

### **Notice to End Users**

Many of our products are intended for use by organizations. Where the Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Administrators are able to:

- require you to reset your account password;
- restrict, suspend or terminate your access to the Services;
- access information in and about your account;
- access or retain information stored as part of your account;
- install or uninstall third-party apps or other integrations

In some cases, administrators can also:

- restrict, suspend or terminate your account access;

- change the email address associated with your account;
- change your information, including profile information;
- restrict your ability to edit, restrict, modify or delete information

Please contact your organization or refer to your administrator's organizational policies for more information.

### **Our policy towards children**

The Services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact us.

### **Changes to our Privacy Policy**

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Services homepages, login screens, or by sending you an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Services and deactivate your account(s), as outlined above.

### **Contact Us**

Your information is controlled by Imagineer Technology Group LLC. If you have questions or concerns about how your information is handled, please direct your inquiry to:



Imagineer Technology Group LLC

551 Madison Avenue, 14<sup>th</sup> Floor

New York, NY 10022

E-Mail: [privacy@itgny.com](mailto:privacy@itgny.com)