

PRATTLE PRIVACY POLICY

Effective February 8, 2018

PLEASE READ THIS PRIVACY POLICY CAREFULLY. By accessing and using the Technology, you agree to be bound by the terms and conditions of this Privacy Policy.

This privacy policy (“**Privacy Policy**”) discloses the privacy practices for the publicly available website located at <https://prattle.co/> (“**Site**”) the Prattle Portals (as defined below) and the smart phone applications available via the Apple App Store and on Google Play. This Privacy Policy is a legally binding agreement between you (“**you**” or “**your**”) and Prattle Analytics LLC, a Delaware corporation, and its subsidiaries and affiliates (collectively referred to as “**Prattle**”, “**us**”, “**our**”, or “**we**”). This Privacy Policy governs and applies solely to information collected, used, maintained, and disclosed by us from your use of the Site (including the Prattle Portals and smart phone apps) and any other offerings, features, tools, and resources provided through our website or other online platforms (collectively, the “**Technology**”). The “**Prattle Portals**” and “**Smart Phone Apps**” are Registered User-only account portals available through the Site or through the Apple App Store and Google Play which enables Registered Users to view, access, and use the products and services provided by Prattle. “**Registered Users**” are eligible individuals or representatives of organizations who have completed the registration process for access to certain private or member-only portions of the Site. This Privacy Policy will notify you of the following:

1. What personally identifiable information is collected from you through the Technology, how it is used and with whom it may be shared.
2. What choices are available to you regarding the use of your information.
3. The security procedures in place to protect the misuse of your information.
4. How you can correct any inaccuracies in your data.

Remember that your use of the Technology is at all times subject to our Terms of Use as stated in the Trial Data License Agreement or End User License Agreement, as applicable, which incorporates this Privacy Policy.

We keep this Privacy Policy posted on our website, available at www.prattle.co, and you should review it frequently, as it may change from time to time with or without notice. ANY CHANGES WILL BE EFFECTIVE IMMEDIATELY UPON THE POSTING OF THE REVISED PRIVACY POLICY. BY ACCESSING AND USING OUR TECHNOLOGY, YOU ARE CONSENTING TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY.

IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, OR TO ANY CHANGES WE MAY SUBSEQUENTLY MAKE, IMMEDIATELY STOP ACCESSING AND USING OUR TECHNOLOGY.

Please remember that this Privacy Policy applies only to information collected by our Technology, and may be supplemented by additional policies, procedures, disclaimers, guidelines, rules, terms or conditions of specific application disclosed by us, including through a registration process, a purchase process or other means. In the event of a conflict between this Privacy Policy and any additional policies, procedures, disclaimers, guidelines, rules, terms or conditions of specific application, the additional policies, procedures, disclaimers, guidelines, rules, terms or conditions of specific application shall control with respect to that specific application. We are also not responsible for the privacy of any information you reveal or post in any public forum (e.g., message board, blog, product reviews, chat room or social media site).

Information Collection, Use and Sharing

Our Technology has the ability to collect two types of information from and about you: (i) personally identifiable information; and (ii) non-personally identifiable information, both as defined below. We are the sole owners of the information collected on our Technology. We only have access to or collect information from you (i) through your use of the Technology; and (ii) that you voluntarily give us via email or other direct contact from you.

Personally Identifiable Information

Our definition of personally identifiable information includes any information that may be used to specifically identify or contact you, such as your name, postal and email addresses, phone number or bank, debit or credit card information. In certain circumstances, we may request, allow or otherwise provide you an opportunity to submit your personally identifiable information in connection with a feature, program, promotion, sale or some other aspect of our Technology. For instance, you may (i) voluntarily provide your name, address, and email address to register a Registered User account with us or register to try our products or services; (ii) provide certain demographic information about yourself (e.g., age, gender, purchase preference, usage frequency, etc.) when participating in a survey or poll, or registering or creating a profile through any of our Technology; (iii) provide payment information when providing payment via our Technology; or (iv) post or send a general comment or recommendation on our Site or other Technology. Certain information may not be personally identifiable when standing alone (e.g., your age), but may become so when combined with other information (e.g., your age and name). Whether or not you provide this information is your choice; however, in many instances this type of information is required to participate in the particular activity or service, realize a benefit we may offer or gain access to certain content through our Technology. For instance:

- Registered Users are provided access to Prattle Portals and to information and online services not provided on the public portion of the Site, as well as the ability to login to Prattle Portals when revisiting the Site and setting your user preferences.
- If you send us an email or use an online form to contact us with questions or comments, we may use your personally identifiable information to respond to your questions or comments, and we may save your questions or comments for future reference. For security reasons, we do not recommend that you send non-public personal information, such as passwords, credit card information, social security numbers or bank account information, to us by email. In certain instances, we may provide you with the option to set your preferences for receiving email communications from us; that is, agree to some communications, but not others. We reserve the right to send you transactional emails such as customer service communications or receipts.

Non-Personal Information

Our definition of non-personal information is any information that does not personally identify you. Non-personal information can include certain personally identifiable information that has been de-identified; that is, information that has been rendered anonymous. We obtain non-personal information about you from information that you provide us, either separately or together with your personally identifiable information. We also automatically collect certain non-personal information from you when you access our Technology. This information can include, among other things: your IP address or other unique identifiers that are automatically assigned to your computer, mobile or other device used to access the Technology; the type of browser you are using (e.g., Internet Explorer, Firefox, Safari, etc.); the third party website from which your visit originated; the operating system you are using (e.g., Vista, Windows XP, Mac OS, etc.); the domain name of your Internet service provider; the search terms you use on our Technology; the specific areas within our Technology that you visit; and the time of day and duration of your visits.

We will use your personal identifiable information to respond to you regarding the reason you contacted us, to fulfill your requests for our products and services, to personalize your online experience and in other ways naturally associated with the circumstances in which you provided the information. Unless you ask us not to, we may contact you in the future to tell you about specials, new products or services, changes to this privacy policy or to communicate with you about content or other information you have posted or shared with us via our Technology.

We may use the non-personally identifiable information that we collect in a variety of ways, including to administer the Technology, help us analyze site traffic, understand customer needs and trends, marketing activities, to carry out targeted promotional activities, improve the quality of the pages that make up our Technology, gather broad demographic information and to improve our Technology. We may use your non-personal information by itself or aggregate it with information we have obtained from others. We may share your non-personal information with our affiliated companies.

In addition to the foregoing, we may use your personally identifiable information or non-personal information as follows:

- When required by law or court order;
- To provide you with information or services or process transactions that you have requested or agreed to receive, including to send you electronic newsletters, to facilitate a purchase, or to provide you with special offers or promotional materials on behalf of us or third parties;
- To process your registration with the Prattle Portals, including verifying your information is active and valid;
- To process your request to free trials with the Prattle Portals, provided that you also agree to any other terms and conditions in connection with these free trials;
- To improve the Technology, to customize your experience with the Technology or to serve you specific content that we believe is relevant to you;
- To enable you to participate in a variety of the Technology's features;
- To contact you with regard to your use of the Technology and, in our discretion, changes to the Technology and related policies;
- For inclusion in our data analytics;
- For purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy;
- To protect or defend our legal rights or property, our Technology or other users; and
- During an emergency to protect the health and safety of our users or the general public.

We will not knowingly sell or rent your personally identifiable information to anyone, except as described in this Privacy Policy or as you otherwise authorize or direct us.

Except as described in this Privacy Policy, we will not share any of your information with any third parties outside of our organization (our organization includes our affiliates and related companies, our contractors, vendors, consultants and professional advisors to the extent necessary for them to perform services on our behalf) and persons or entities with whom we have marketing, business or other relationships, other than as necessary to fulfill your requests, such as to process an order or payment. For example, we may use a third party credit card processing company to bill users for goods and services, or if we partner with another party to provide specific services, then when the user signs up for these services, we will share names or other contact information that is necessary for the third party to provide these services.

You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us via the email address or phone number given on our Site.

Security

When you submit information to us through any of our Technology, you should be aware that your information is transmitted across the internet and that no method of transmission over the internet is completely or 100% secure. While we take reasonable precautions to protect your information, you also need to ensure you take appropriate steps to protect your information. We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the information under our control. Please be advised, however, that while we strive to protect your personally identifiable information, other information and privacy, **we cannot guarantee or warrant the security of any information you disclose or transmit to us online, and we are not responsible for the theft, destruction or inadvertent disclosure of your personally identifiable information or any other information.** In the unfortunate event that your “personally identifiable information” (as the term or similar terms are defined by any applicable law requiring notice upon a security breach) is compromised, we may notify you by e-mail (at our sole and absolute discretion), to the last e-mail address you have provided us, in the most expedient time reasonable under the circumstances; provided, however, delays in notification may occur while we take necessary measures to determine the scope of the breach and restore reasonable integrity to the system as well as for the legitimate needs of law enforcement if notification would impede a criminal investigation. From time to time, we evaluate new technology for protecting information and, when appropriate, we upgrade our information security systems.

Updates to this Privacy Policy

Our Privacy Policy may change from time to time and all updates will be posted on this page.

Information Collection Methods

A few of the methods and/or avenues that may be used to collect non-personal information include, without limitation, the following (as well as subsequent technology and methods later developed):

Cookies

We use “cookies” on our Technology. A cookie is a piece of data stored on a user’s hard drive to help us improve your access to our Technology and identify repeat visitors to our Technology. For instance, when we use a cookie to identify you, you may not have to log in using a password more than once, thereby saving time while on our Technology. Cookies can also enable us to track and target the interests of our users to enhance the experience on our Technology. Usage of a cookie is in no way linked to any personally identifiable information on our Technology.

Some of our business partners may use cookies on our Technology. However, we have no access to or control over these cookies.

Web Beacons

“Web beacons” are small graphic images or other web programming code that may be included in our Site pages or other areas of the Technology. Web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of users of our Site pages and Technology. Unlike cookies, which are typically stored on your computer or mobile device’s hard drive, web beacons are embedded invisibly on web pages. Web beacons or similar technologies help us better manage content on our Site and other Technology by informing us what content is effective, counting the number of users of the Site and other Technology, monitoring how users navigate the Site and other Technology or counting how many e-mails, articles or links were actually opened or viewed.

Embedded Scripts

An “embedded script” is programming code that is designed to collect information about your interactions with the Technology, such as the links you click on. The code is temporarily downloaded onto your computer, mobile or other device from our server or a third party service provider.

Web Traffic and Web Performance Analytics

We may also collect information using a variety of reports from web traffic and web performance analytics companies to improve our Technology. This information allows us to better understand users of the Technology and to customize the Technology while also tracking our success at reaching new audiences. This Privacy Policy does not govern the ability of any third party analytics company to use and share information collected by such company.

IP Addresses

An IP address is a number that is assigned to your computer, mobile or other computing device whenever you are surfing the Internet. Web servers (computers that “serve up” web pages) automatically identify your computer or other computing device by its IP address. When users request pages from our Technology, our servers may log their IP addresses. We may collect IP addresses for the following purposes, among others: system administration, to report non-personal aggregate information to others and to track the use of our Technology. IP addresses are considered non-personal information and may also be shared as provided above.

Information from your Mobile Device

We may also use technologies, such as location based information, to provide you with tailored information and features as you use our Technology. When you access the Technology on your mobile device, including, but not limited to, mobile phones and tablets (“Mobile Device”), we may obtain information from your Mobile Device about the type of Mobile Device you are using. We may use this information to notify you of features and products that may be available on your Mobile Device. Certain features may require our collection of the phone number of your Mobile Device. We may link that phone number to the Mobile Device identification information, but will not use that number for telemarketing. In addition, some mobile network providers (“Mobile Provider”) in the U.S. are required to use technology that tracks the physical location of Mobile Devices that use their service. Depending on your Mobile Provider and Mobile Device, we may automatically receive this information. If we begin to offer services that use this tracking (“pinpointing”) information, we will obtain your consent (an opt-in) before using the information. After obtaining such consent, we may use and store this information to provide location-based services, including location-targeted advertising. Most Mobile Devices provide users with the ability to disable location services. These controls are usually located in the Mobile Device's settings menu. If you have questions about how to disable your Mobile Device's location services, we recommend you contact your Mobile Provider or your Mobile Device manufacturer.

Links

Our Technology contains links to other, third party sites that we do not control or maintain. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users that leave our Site or Technology to be aware of and to read the privacy statements of any other site, as we have no control over information that is submitted to, or collected by, these third parties. We cannot and will not be responsible for the protection and privacy of any information that you provide while visiting such websites and such websites are not governed by this Privacy Policy.

From time-to-time, our Technology requests information via surveys or similar methods. Participation in these surveys or similar methods is completely voluntary and you may choose whether or not to participate and therefore disclose this information. Information requested may include contact information (such as

name and shipping address) and demographic information (such as zip code and age level). The collected information will be used for purposes of monitoring or improving the use and satisfaction of the Technology.

Your California Privacy Rights

California Civil Code Section 1798.83 permits users that are residents of California to request the following information regarding our disclosure of your personal information to third parties for those third parties' direct marketing purposes: (i) a list of certain categories of personally identifiable information that we have disclosed to certain third parties for their direct marketing purposes during the immediately preceding calendar year; (ii) the identity of certain third parties that received personally identifiable information from us for their direct marketing purposes during that calendar year; and (iii) examples of the products or services marketed (if we have that information). If you are a California resident and would like to make such a request, please email us at support@prattle.co or write us at the address below:

PRATTLE ANALYTICS LLC
4240 Duncan Ave, #200
Saint Louis, MO 63110

No Children

We are committed to protecting the privacy of children. Our Technology is not designed for or directed to children under the age of 13. We do not collect personally identifiable information from any person we actually know is under the age of 13. We urge all parents or guardians to participate in their children's exploration of the Internet, and to teach their children about protecting their personally identifiable information while online. If you use the Technology, you hereby represent and warrant that you are at least 13 years of age. In compliance with the Children's Online Privacy Protection Act, any information we receive from users we believe to be under the age of 13 will be purged from our database.

Users from Outside the United States

Our Technology is hosted in the United States and is governed by United States law. If you are using our Technology from outside the United States, please be aware that your information may be transferred to, stored and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. **By using our Technology, you expressly consent to your information being transferred to our facilities and to the facilities of those third parties with whom we share it as described in this Privacy Policy.**

Sole Statement

This Privacy Policy, as posted on our Site at www.prattle.co, is the sole statement of our privacy policy with respect to our Site and our Technology, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy.

If you feel that we are not abiding by this Privacy Policy, you should contact us immediately via telephone at 646-847-2386 or via email at support@prattle.co.