

## **KNOVVA PRIVACY POLICY**

Effective Date: March 7, 2018

Knovva Academy, Inc. (“**Knovva**,” “we,” “us” or “our(s)”) is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the personal data that we collect from Knovva members (“Member(s),” “you,” “your(s)”), including on the Knovva website, mobile application(s) (each individually or together, the “Site”), and other Knovva services or programs in or to which this Privacy Policy is posted or linked. This Privacy Policy applies to personal data collected online and offline.

By using our Site or participating in any Knovva programs, you agree to the collection, use and disclosure of your information in accordance with this Privacy Policy and you represent that you have read and understand this Privacy Policy and other Knovva Policies and agree to be bound by the terms therein.

Capitalized terms not defined in this Privacy Policy have the meanings given in our Terms of Service available at [http://cdn.knovva.com/knovva\\_terms\\_and\\_conditions.pdf](http://cdn.knovva.com/knovva_terms_and_conditions.pdf).

In this Privacy Policy, we define “personal data” as information that directly identifies an individual person directly or indirectly an individual person by reference to an identifier.

### **DATA CONTROLLER**

If you are a resident of the EEA, the data controller for the information you provide or that we collect pursuant to this Privacy Policy is:

Privacy Team  
451 D Street, Suite 710  
Boston, MA 02210

### **TYPES OF INFORMATION WE COLLECT**

The information we collect depends on how you use the Site.

When you create an account on the Site (“Account”), we collect:

- your user name, password information;
- your name, avatar, address, geolocation information, birthdate, telephone number, e-mail address, Facebook or Google contact data (“Profile Data”) that is associated with or linked to your Account; and
- Text, data, pictures or any other Content (as defined in the Terms of Service) that you post on the Site.

If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other Content included in the email, in order to send you a reply.

When you participate in one of our surveys, contests and/or promotions, we may collect additional Profile Data.

When you post messages, comments or other Content on the Site, the information contained in your posting will be stored on our servers and other Members and Internet users will be able to see it. We may also collect additional Profile Data, such as at other points in the Site that state or otherwise indicate that Profile Data is collected.

When you use the Site, we collect information about which features you used and how you used them. Depending on the settings of your computer or mobile device (“**Device**”), we also automatically collect: Device you use (make, model and operating system version); your MAC address or other Device ID; the IP address of your Device; your mobile operating system; the type and language of Internet browser you use; mobile network information; internet service provider; country and time zone in which the Device is located; and metadata stored on the Device. This information is collected through cookies and other data collection tools. For more information about cookies, please see below.

We also may collect information about your location depending on the permissions you have set on your Device and/or your Account preferences.

## **HOW WE USE YOUR INFORMATION**

The information we collect from you may be used in the following ways:

- provide the Site and related services to you;
- organize educational and experiential programs, including keeping enrollment records and making certain lodging and travel arrangements;
- facilitate the creation of and secure your Account on our network;
- identify you as a Member in our system;
- improve administration of the Site;
- allow you to share your Content with other Members;
- improve the quality of experience when you interact with the Site;
- send you a welcome e-mail to verify ownership of the e-mail address provided when your Account is created;
- send you administrative e-mail notifications, such as security or support and maintenance advisories;
- respond to your inquiries related to employment opportunities or other requests;
- make telephone calls to you, from time to time, as a part of secondary fraud protection or, where permitted to solicit your feedback; and
- send newsletters, surveys, offers, and other promotional materials related to Knovva.

To process your information as described in this Privacy Policy, we rely on the following legal bases:

*Legitimate interests:* We may use your information where we have legitimate interests to do so. For example, we analyze Members’ behavior to improve the Site and to prevent and detect fraud.

*Consent:* From time to time, we may ask for your consent to use your personal data. You may withdraw your consent at any time by contacting us using the contact information provided below.

## **COOKIES AND OTHER INFORMATION COLLECTED BY TECHNOLOGY**

We use Cookies and other data collection technology

- “Cookies” are small pieces of information that a website sends to your computer’s hard drive or device while you are viewing a website. We may use both “Session Cookies” (which expire once you close your Web browser) and “Persistent Cookies” (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on the Site. Persistent Cookies can be removed by following your Internet browser’s help file directions.
- To make our Site more useful to you, our servers (which may be hosted by a third party service provider) collect “Log Data.” Log Data may include information such as your computer’s Internet

Protocol (“IP”) address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

Data collection technology helps us improve your experience of the Site by, for example, storing your password so you do not have to re-enter it each time you use the Site, compiling statistics about use of the Site and helping us analyze technical and navigational information about the Site and to detect and prevent fraud. We also may use other data collection technology to collect information from the Device that you use to access the Site, such as your operating system type, browser type, domain and other system settings, as well as the language your system uses and the country and time zone in which your Device is located.

***Your Control of Cookies:*** Some mobile web browsers provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your Device. You also may be able to reject mobile device identifiers by activating the appropriate setting on your Device. Although you are not required to accept cookies or Device identifiers, if you block or reject them, you may not have access to all features available through the Site.

***Our Policy On Do Not Track Signals:*** Some web browsers (including Safari, Internet Explorer, Firefox and Chrome) incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a user does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain personal data about the browser’s user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including Knovva, do not respond to DNT signals.

## **YOUR CHOICES REGARDING YOUR INFORMATION**

If you would like to review, correct, update, restrict or delete personal data that you have previously provided to us, or if you would like to receive an electronic copy of your personal data for purposes of transmitting it to another company (if and when these rights are provided to you by law), please contact us at [info@knovva.com](mailto:info@knovva.com).

In your request, please make clear what personal data you would like to have changed, whether you would like to have your personal data deleted or suppressed or other limitations you would like to put on our use of your personal data. For your protection, we will verify your identity before fulfilling your request. We will respond to your request as soon as reasonably practicable and in any event within 30 days.

Please note that we often need to retain certain personal data for recordkeeping purposes and/or to complete any transaction that you began prior to requesting a change or deletion. Our databases and other records may have residual data which are not removed. In addition, we also may not allow you to review certain data for legal, security or other reasons.

If at any time you believe that the Site has not adhered to this Privacy Policy, please let us know. We will use good faith efforts to determine and correct the problem.

## **MARKETING COMMUNICATIONS**

When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the email you receive or by contacting us directly. Despite your indicated e-mail preferences, we may send you service related communications.

## **CROSS BORDER DATA TRANSFERS**

Sharing of information sometimes involves cross-border data transfers to or from the United States of America and other jurisdictions. For example, when the Site is available to Members in the European Economic Area (“EEA”), personal data is transferred to the United States. We use the EU-US and Swiss-US Privacy Shield/standard contractual clauses/other measures approved by the European Commission to validate transfers of EEA residents’ personal data from the EEA to other countries.

## **DISCLOSURE OF YOUR INFORMATION**

We do not sell, trade, or otherwise transfer your Profile Data to advertising networks. However, your personal data may be provided to other parties for marketing, advertising, or other uses.

### *Affiliates*

We may share some or all of your information with any parent company, subsidiaries, joint ventures, or other companies under a common control (“Affiliates”), in which case we will require our Affiliates to honor this Privacy Policy.

### *For Corporate Transactions*

We may transfer your information if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control.

### *When Required By Law*

Applicable law may require us and our service providers to disclose your information if: (i) reasonably necessary to comply with a legal process, such as a court order, subpoena or search warrant, government investigation or other legal requirements; or (ii) necessary for the prevention or detection of crime (subject in each case to applicable law).

### *To Enforce Legal Rights*

We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our Members, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

### *With Your Consent Or At Your Request*

We may ask for your consent to share your personal data with third parties. When we do, we will make clear why we want to share the personal data.

### *Third Party Providers*

Occasionally, at our discretion, we may provide access to, links to or information about third party products or services via our Site. In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this type of information in order to increase our Service’s functionality. These third party sites have separate and independent policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our Site and welcome any feedback about these sites. Knovva may share your Profile Data with third party providers to:

- provide you with the services that we offer you through the Site;
- conduct quality assurance and data security testing;
- facilitate creation of Accounts;
- provide technical support; or
- provide other security or administrative services to Knovva.

These third-party service providers are required not to use your personal data other than to provide the services requested by Knovva. If you engage in a transaction with another Member via the Site, we may transfer your Profile Data information to that Member.

We may collect and share aggregate information about our Members (such as how many persons used the Site on a particular date) but this aggregated information generally does not include personal data about any individual person.

## **SECURITY OF YOUR INFORMATION**

We use physical, technical and organizational measures designed to protect your information against unauthorized access, theft and loss. We restrict access to your personal data to those employees who need to know that information to perform their job functions.

Although we takes precautions intended to help protect information that we process, no system or electronic data transmission is completely secure. Any transmission of your personal data is at your own risk and we expect that you will use appropriate security measures to protect your personal data.

You are responsible for maintaining the security of your Account. We may suspend your use of all or part of Site without notice if we suspect or detect any breach of security. You understand and agree that we may deliver electronic notifications about breaches of security to the email address provided through your Account.

If you believe that your Account is no longer secure, please notify us immediately at [info@knovva.com](mailto:info@knovva.com).

## **RETENTION OF PERSONAL DATA**

We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you (for example, for as long as you have an Account with us or keep using Site);
- Whether a legal obligation to which we are subject applies (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); and
- Whether retention is advisable and considering our legal position (such as for statutes of limitations, litigation or regulatory investigations).

## **CHILDREN'S PRIVACY**

We do not knowingly collect personally identifiable information from children under age 16 without verification of parental consent. If you are a parent or guardian and you learn that your child provided us with personal data, please contact us. While we are not under any obligation to actively monitor the Site for such information, if we become aware that we have collected personal data from a child without

verification of parental consent, we will do our best to remove that information from our servers in a timely manner.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, you can request a notice disclosing the categories of personal data about you that we have shared with third parties for their direct marketing purposes during the preceding calendar year. To request this notice, please submit your request to:

451 D St., Suite 710  
Boston, MA 02110 – USA  
info@knovva.com +1(617)577-7770

Please allow 30 days for a response but if we have not disclosed personal data about you with third parties for their direct marketing purposes, we will not send a response.

## **CHANGES TO THIS PRIVACY POLICY**

The Effective Date at the top of this page indicates when this Privacy Policy was last revised. Unless applicable law prevents or a change is needed to protect the privacy or security of our uses, we will notify you before any material change takes effect so that you have time to review the changes before they are effective. The previous version of this Privacy Policy available at [http://cdn.knovva.com/knovva\\_policy+v1.0.pdf](http://cdn.knovva.com/knovva_policy+v1.0.pdf) will apply until the Effective Date. Your use of the Site after the Effective Date means that you accept the Privacy Policy as revised.

## **LINKS TO OTHER WEBSITES AND SERVICES**

The Site may include links to third-party websites and services that are not operated by us. When you click these links, you are directed away from the Site. A link to a third-party website or service does not mean that we endorse it or the quality or accuracy of information presented on it. If you decide to visit a third-party website or service, you are subject to its privacy practices and policies, not ours. This Privacy Policy does not apply to any personal data that you provide to these other websites and services.

The paragraph headings in this Privacy Policy are for convenience of reference only and shall not affect the meaning or interpretation hereof. The English-language version of this Privacy Policy controls in the event of any conflict with a non-English language version.

## **CONTACT INFORMATION**

If you have any questions about this Privacy Policy, please contact us at:

Attention: Privacy Team  
Knovva Academy, Inc.  
451 D St., Suite 710  
Boston, MA 02110 – USA  
info@knovva.com  
+1(617)-577-7770