

JOLT® PRIVACY POLICY

Last Updated: October 23, 2017

This privacy policy ("**Privacy Policy**") describes our, Casual Speakers Ltd.'s ("**Jolt**", "**we**", "**our**" or "**us**"), information practices in connection with the access and use of: (a) our website www.jolt.us (together with its subdomains, the "**Site**"), (b) our community-driven learning eco-system service made available by and through the Site (the "**Service**"), and/or (c) our various software applications (the "**Apps**"). The Site, the Service, and the Apps may individually and collectively be referred to herein as the "**Services**". The section and sub-section headings used below are for convenience of reading only (and are not to be used for interpretive purposes), but we hope they make navigating this Privacy Policy easier.

This Privacy Policy is hereby incorporated by reference into our then-current *Terms of Service* available at www.jolt.us/terms (the "**Terms of Service**"). Capitalized terms used but not defined herein, shall have the meanings ascribed to them in the Terms of Service.

The Service may not be hosted by us – all or some of the hosting is done by third party service providers that we engage. This means that data you provide us or that we or third parties collect from you (including any Personal Information, as defined below) is hosted with such third party service providers on servers that they own or control. Regardless of where such third party service providers are located (and some are located in the US), their servers may be located anywhere in the world (including the US). Your data may even be replicated across multiple servers located in multiple countries. So please be aware that you are consenting to your data being transferred to various third party service providers around the world (including the US) for such hosting purposes.

Generally speaking, Jolt may receive information because:

- (a) You have provided it to us;
- (b) We collect it from you; or
- (c) Third parties we engage (such as data analytics providers) collect it from you on our behalf. This happens in cases where we use or deploy third party tracking technology, or where we otherwise give these third parties access to the Services and other technology. **So where we describe below in Section 3 (*Information We Collect From You*) the ways in which we collect information from you, you acknowledge that such collection may also be carried out by third parties.** These third parties may have their own privacy policies that they adhere to, so they won't necessarily adhere to this Privacy Policy; *however*, we do try to engage third parties that post a privacy policy. Also, just as with our third party hosting providers, these third parties may be based (and their servers may be located) anywhere in the world.

As used in this Privacy Policy:

- (i) "**Personal Information**" means information that may be used, either alone or in combination with other information, to personally identify an individual, such as a first and last name, an email address, phone number, a home or other physical address, and other similar contact information.
- (ii) "**Anonymous Information**" means information which is not Personal Information, including without limitation aggregated or statistical information, and Personal Information that may have been de-identified, hashed or otherwise anonymized.

1. **Consent and Modification.** You are not legally obligated to provide us with Personal Information, and you confirm that any Personal Information you do provide to us is provided voluntarily. By using any part of the Services, you hereby consent to the terms of this Privacy Policy and the practices described herein. If you do not agree to this Privacy Policy, please do not access or otherwise use any part of the Services. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective seven (7) days following posting of the revised Privacy Policy on the Site, and your continued use of the Services thereafter means that you accept those changes.
2. **Information You Provide To Us.** You may provide Personal Information to us in the following ways:
 - 2.1. Account. In order to create a Service Account, we may require you (or in some cases, may just give you the option) to provide Personal Information, such as your name, home address, phone number, and email address. We may also offer the option of creating a Service Account through connecting via a pre-existing account that you may have with third parties, such as Facebook (a "**Third Party Account**"), in which case we may require you to approve the connection as well as the types of information (which may include Personal Information) that is made available to us from, and the types of activities that we may perform in connection with, that Third Party Account. We collect information (including but not limited to information which is detailed and displayed to you in the notice which appears during the integration process with such Third Party Account) from such Third Party Accounts on an ongoing basis so we can update your profile. We may combine this information with other Personal Information we received through the Services. If we do so, this Privacy Policy governs any of this combined information that we maintain in personally identifiable format. Even if you later disconnect your Service Account from the Third Party Account, we still keep a copy of the Personal Information that we received from the connection of the two accounts. Please remember that the manner in which such third parties use, store or disclose your information is governed solely by their policies and we will have no liability or responsibility for the privacy practices or other actions of such third parties. If you do not agree to these practices please do not use the Third Party Account integration feature.

In either case, we may send you an email, text message, or other electronic message confirming your Service Account creation (or otherwise instructing you how to confirm it).

- 2.2. Journeys and Sessions. If you organize or attend a Journey or Session, or if you otherwise interact with other users of the Services, you may be required to provide us with certain Personal Information, such as your name and a profile image.
- 2.3. 'Contact Us' Information. If you send us a "Contact Us" request, whether by submitting an online form that we make available or by sending an email to an email address that we display, by using a feedback or reporting feature, or by other means, you may be required to provide us with certain Personal Information such as your name and email address.
- 2.4. Communicate with Us. You may provide Personal Information through your communications with our community-support team or through other communications with us, including through social media.
- 2.5. Purchases. If you make a purchase via the Services (for example, payment of Membership Fees), you will be required to provide account and billing information, invoice related

information, and other data required to process and fulfill the purchase. We may also update such data should you grant us permission to bill you or your credit card for recurring charges, such as monthly (or other periodic) payments. We may use the products and services of third party service providers to process and fulfill such purchases, in which case you will be providing the information to them as well (although in such cases we will not collect or store your full payment card information).

- 2.6. Profile. The Services may enable you to build a public profile in connection with your Service Account ("**Public Profile**"). Your Public Profile will include your name, but you may choose to provide other Personal Information, such as your gender, a profile picture, and other information that we may offer you to present.
- 2.7. Share with Others. The Services may offer Features enabling you to invite others to use the Services, for example by sending an invitation email from the Services to the recipient's external email address. If you send or post an invitation, you will be providing us with Personal Information about the recipient such as his/her email address or online account user name and ID.
- 2.8. Blogs, Newsletters, Surveys and Promotions. The Services may contain a blog forum displaying information about Jolt and some of our products and services. The Services may also offer you the opportunity to subscribe to newsletters and participate in surveys and other promotional activities. In each of the foregoing cases, your interaction (such as responding on the blog forum, subscribing to a newsletter, or participating in a survey) may require you to provide certain Personal Information such as your name and email address.

3. Information We Collect From You. We collect Personal Information and other Anonymous Information from you in the following ways:

- 3.1. Log Files; Device and Usage Data. We collect information through server log files, but also by deploying tracking technologies within the Services, and we may also associate this information with your Service Account. We do this to analyze trends, track user movement around the Services, gather demographic information, and to generally collect information that we may find insightful or helpful. The type of information collected may include (but is not limited to) internet protocol (IP) addresses (which may vary from session to session), MAC address, mobile network information including phone number, device type and hardware model, browser type, operating system type, browser type, Internet Service Provider (ISP), date/time stamp of Services use, referring/exit pages, keyboard language, screen resolution, 'clickstream' and clicked pages. For example, parts of the Services use: (a) *Google Analytics*, more information on which you can find here: www.google.com/intl/en/policies/privacy/partners/; (b) *Mixpanel*, more information on which you can find here: <https://mixpanel.com/terms> (in particular, please note the various opt-out options set forth in such *Mixpanel* terms); (c) *Jaco*, more information on which you can find here: <https://www.getjaco.com/privacy.html>; and (d) *Intercom*, more information on which you can find here: <https://www.intercom.com/terms-and-policies#privacy>.
- 3.2. Cookies. The Services may use "cookies". A cookie is text file placed on your hard drive and stored by your browser. In some cases, we may use 'session' cookies (which expire once you close the applicable webpage) and in other cases we may use 'persistent' cookies (which stay on your system until you delete them). We use cookies to administer, and provide you with access to, the Services; but we also use cookies to improve the user experience of the Services (for

example, cookies and other technologies may serve to recall an IP address previously indicated by a user, or may otherwise allow us to enable automatic activation of certain features) and to collect statistical or aggregated data about how you and other users use and interact with the Services, which may include for the purpose of serving advertisements and other marketing content. Some of the cookies are set by us, and some may be set by third parties, in which case the third party hosts it (for example, social plug-ins, such as a "Like" button, involve the setting of cookies by the applicable third party). If you do not want to receive cookies, consult your respective browser settings. This may allow you to receive notifications when cookies are set, or to otherwise block cookies altogether. You may also be able to delete cookies that have already been set. If you do block or restrict cookies, various features and functionality of the Service may be impaired.

- 3.3. Data Retention. By using the Services, you are authorizing us to gather, process, analyze, and retain data related to the provision of the Services. We may retain such information, including Personal Information, indefinitely.
4. **The Way We Use Personal Information**. In addition to the uses of Personal Information described elsewhere in this Privacy Policy, we also use Personal Information in the following ways:
 - 4.1. To Generally Provide You with the Services. We will use Personal Information to: (a) administer and provide the Services to you (including connecting you with other users); (b) further develop and improve the Services; (c) send you updates, promotions, offerings, or other news of or about the Services or Jolt; (d) respond to communications with you; (e) identify or authenticate your access and use of the Services; or (f) send you updates and marketing information related to our products and services.
 - 4.2. Transfer To Third Parties. We may send or otherwise share Personal Information to or with various third parties that help us with our operations and help us understand how our users use the Services, and to develop and improve them. These third parties may have their own privacy policies that they adhere to, so they won't necessarily adhere to this Privacy Policy. Also, just as with our third party hosting providers, these third parties may be based (and their servers may be located) anywhere in the world.
 - 4.3. Displaying to Other Users. The information and content you provide may be displayed on the Services. Other users of the Services may be able to see some information about you, such as your name, contact information, your social network pages, Sessions you participated in, skills that you offer the community to be assisted with. We are not responsible for how other users will view and use the posted information.
 - 4.4. Social Networking Websites. The Services may allow you to share information, including Personal Information, with social networking websites, such as Facebook. We will not share your Personal Information with social networking or other websites unless you direct the Services to do so. Their use of the information will be governed by their privacy policies, and we are not responsible for how they treat the information.
 - 4.5. Enforcement. We may send or otherwise share Personal Information with any third party if we believe that disclosure of such information is helpful or reasonably necessary to: (a) comply with any applicable law, regulation, legal process, or governmental request; (b) enforce the Terms of Service, including investigations of potential violations thereof; (c) detect, prevent, or

otherwise address fraud or security issues; or (d) protect against harm to the rights, property or safety of Jolt, a Jolt Affiliate, our users, yourself, or the public.

5. **Publicly Available Information.** Any content that you make publicly available on or via the Service (such as your Public Profile) will be publicly available to other users of the Service. If you actively or passively allow your contact information to be public, you may receive unsolicited messages or activity from other users of the Services. We therefore encourage you only to post information that you are sure you want to be publicly accessible. Personal Information, such as your full name, country & city, profession, skills and activity in the community may also be accessible via search engines or similar services. You may be able to keep some of your information private by adjusting any privacy settings that the Services makes available to you.
6. **Opting Out.** You may choose not to receive future promotional, advertising, or other Services-related emails from us by selecting an unsubscribe link at the bottom of each email that we send. Please note that even if you opt out of receiving the foregoing emails, we may still respond to communications initiated by you, as well as send administrative emails that are necessary to facilitate your use of the Services.
7. **Anonymous Information.** Subject to applicable law, we may use and share Anonymous Information for any purpose whatsoever and with any third parties (such as advertisers and marketing partners), including in exchange for compensation or other monetization.
8. **Access and Accuracy.** We would like to maintain accurate Personal Information. If you would like to delete or correct any of your Personal Information that we may be storing, there may be tools that we make available via the Services. Otherwise, please contact us at support@jolt.us to request deletion containing adequate details of the request (although we do not undertake to respond to, or otherwise implement, the request within any specific period of time). Please be aware that information deleted (whether directly by you or pursuant to a deletion request) may or may not be permanently deleted, and may remain stored on our servers (or those of our third party service providers) - in such cases, the information will no longer be accessible or visible to you, but will be accessible and visible to us. We, at our discretion, will decide whether or not to permanently delete information from our servers.
9. **Links to and Interaction with Third Party Products.** The Services may link to, or otherwise enable you to interact with, third party content, products and services. Any Personal Information you provide in connection therewith is provided to the third party. We are not responsible for the privacy practices of such third parties, or for such content, products and services, and we encourage you to read the terms and conditions and privacy policies of each third party that you choose to use or interact with. Such interactions are at your sole risk.
10. **Children's Privacy.** The Services are not structured to attract nor directed toward children under the age of 18 years. Accordingly, we do not intend to knowingly collect Personal Information from anyone we know to be under 18 years. If we learn that we have collected Personal Information from a child under 18 years, we will use commercially reasonable efforts to delete that information. If you believe that we might have any such information, please contact us at support@jolt.us. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of 18 are not using the Services.

11. **Security.** We take steps in an effort to treat your Personal Information and other information securely and in accordance with this Privacy Policy. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore we cannot ensure or warrant the security or confidentiality of your information. We do not accept liability for unintentional disclosure. If you have any questions about security on the Services, you can contact us at support@jolt.us. By using the Services or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on/in the Services or sending an email to you. JOLT SHALL NOT BE RESPONSIBLE OR LIABLE FOR ANY UNAUTHORIZED ACCESS, HACKING, USE, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION.
12. **Marketing.** We may rent, sell or otherwise allow access to data collected by the Services to enable the delivery of online advertising on/in the Services, or to send you information we think may be useful or relevant to you. You hereby agree that we may use the contact details you provided us for customer support purposes, as well as to inform you regarding our products and services. You may withdraw your consent by following the instructions for removing yourself from the mailing list which are available in the message transmitted to you.
13. **Merger, Sale or Bankruptcy.** In the event that Jolt (or its business or assets) is acquired by, or merged with, a third party entity (or otherwise undergoes a similar business transaction, such as a divestiture), your Personal Information may be treated as a business asset, and we may (and hereby reserve the right to) transfer or assign the Personal Information and other information we have collected or received. In the event of a bankruptcy, insolvency, receivership, or comparable event, we may not be able to control how your Personal Information is treated, transferred, assigned, or used.
14. **California Privacy Rights.** California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure (if any) of Personal Information to third parties for their direct marketing purposes. To the extent applicable, you may make such a request by sending an email to support@jolt.us. Please note that we are only required to respond to one request per customer each year.
15. **Our "Do Not Track" Notice.** We do not currently respond or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of Personal Information about that individual consumer's online activities over time and across third-party web sites or online services. We may allow third parties, such as companies that provide us with analytics tools, to collect Personal Information about an individual consumer's online activities over time and across different web sites when a consumer uses the Services.
16. **Deletion of Content from California Residents.** If you are a California resident under the age of 18 and a registered user of certain parts of the Services, California Business and Professions Code Section 22581 permits you to remove content or Personal Information you have publicly posted. If you wish to remove such content or Personal Information, please contact support@jolt.us, and provided you specify which content or Personal Information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you will not be able to restore removed content or Personal Information. In addition,

such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require (or allow) us to enable removal.

17. **Commitment.** Protecting your privacy online is an evolving area, and we try to evolve our Services to meet these demands. If you have any comments or questions regarding this Privacy Policy, please contact us at support@jolt.us.