

## **imbrex.io PRIVACY POLICY**

*Revised as of 26-Oct-2018*

We take your privacy seriously.

When you provide information to imbrex.io (collectively, "we", "us" and "our") you trust us to safeguard your privacy, and we are committed to doing so. This Privacy Policy explains:

- What information we collect, and how and why we collect it
- How we use that information
- How you can contact us if you have questions

This Privacy Policy applies whenever we collect personal information from or about you. This Privacy Policy does not apply to the practices of third parties that imbrex.io does not own or control.

This website is not intended for children, and we do not knowingly collect data relating to children.

### **Controller, Processor, and Data Privacy Officer**

This privacy notice is issued on behalf of imbrex.io. The words "we", "us", "our", or "Imbrex", or "imbrex" in this privacy notice refer to imbrex.io, which is responsible for processing your data and is the controller and responsible party for this website.

Our Data Privacy Officer is Stephen King, who can be reached at support@imbrex.io, or regular mail at 1460 Broadway, New York, New York 10036.

We hope that we can resolve any concern you may raise about this website or our use of your information. If you live or work in the European Union or European Economic Area, the [General Data Protection Regulation](#) gives you right to lodge a complaint with a supervisory authority where you work, normally live, or where any alleged violation of data protection laws occurred. We would, however, appreciate the chance to deal with your concerns ourselves first, and will endeavor to address all issues to your reasonable satisfaction if you contact us in the first instance.

### **Collection of Personal Information**

#### **Information We Collect About You and How and Why We Collect It**

We collect several types of information from, and about, users of our website, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number (“personal information”); and/or
- About your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies.

Information You Provide to Us. The information we collect on or through our website from you may include:

- Information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, subscribing to our services, posting material, or requesting further services. We may also ask you for information when you report a problem with our website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our website. You may be required to provide financial information before engaging in transactions on our website.

Information We Collect Through Automatic Data Collection Technologies. As you navigate through and interact with our website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical data and does not include personal information, but we may maintain it, or associate it with personal information we collect in other ways, or receive from third parties. It helps us to improve our website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.

- Store information about your preferences, allowing us to customize our website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our website.

If you submit any personal information relating to others to us, or to our service providers, in connection with our sites or services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Statement.

Personal Information collected online through our sites may also be supplemented with information you provide to us through other imbrex, online or offline services, as well as through online tagging and tracking methods such as “cookies.” A cookie is a small data file placed on the hard drive of your computer when you visit certain websites. A cookie file can contain information such as a user ID, used to track site and content traffic patterns. You can turn tracking cookies off in your browser, although this may limit the site functionality you experience.

We also may receive, or acquire, information about our visitors, job seekers, customers and suppliers from third-party partners such as background-check providers or other sources, such as information from publicly available sites.

### **Uses of Personal Information**

The personal information imbrex collects is used to:

- Provide services and information to you;
- Respond to communications we receive from you;
- Comply with applicable laws and government regulations;
- Send you emails and other communications about imbrex marketing, advertising and promotions in accordance with your marketing preferences;
- Present our website and its contents to you;
- Provide you with notices about your account/subscription, including expiration and renewal notices;
- Carry out our obligations and enforce our rights;
- Notify you about changes to our website or any products or services we offer or provide though it;
- Allow you to participate in interactive features on our website;

The table below explains the purpose for which we use, or process, your personal data and our reasons for doing so:

<b>Our Purpose in Using Your Personal Data</b>	<b>Our reasons for Using or Processing the Personal Data</b>	<b>Type of Data</b>
To provide imbrex services to you	For the purpose of performing our services, or to take steps at your request before performing the services	(a) identity (b) contact (c) profile (d) marketing and communications
Operational reasons, such as improving efficiency	For our legitimate interests or those of a third-party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you	(a) identity (b) contact (c) profile (d) usage (e) marketing and communications (f) technical
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third-party, i.e. to protect our intellectual property and other commercially valuable information  To comply with our legal and regulatory obligations	(a) identity (b) contact (c) profile (d) usage (e) marketing and communications (f) technical
To deliver relevant website content and advertisements to you and measure, or understand, the effectiveness of the advertising we serve to you	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	(a) identity (b) contact (c) profile (d) usage (e) marketing and communications (f) technical

We may use personal information in any other way we may describe when you provide the information, and for any other purpose with your consent. We may also use the personal information we receive for the purposes of creating aggregated statistics that do not reveal the identity of any person

### **Sharing with Third Parties and Affiliates**

imbrex.io may disclose your personal information to any affiliate of imbrex.io, or to vendors, consultants, potential and actual acquirers, and service providers, for use in accordance with this Privacy Statement. This sharing of personal information with imbrex.io affiliates and others may include combining the personal information gathered by certain imbrex.io sites with information gathered by affiliates. Again, this combined information will only ever be used for the purposes outlined in this Privacy Policy.

In connection with the above, we may disclose certain data about you (such as criminal background checks, resumes, or identifying information such as your social security number) with other service providers or agents acting on our behalf to comply with various legal requirements.

We may also disclose personal information to a third party where we are legally required to do so in order to respond to, or comply with, any applicable law, regulation, or court order. We may also do so in order to prevent fraud or threats to the safety of any person, or to exercise our legal or other rights, or defend against legal claims.

We do not sell, rent, or lease your personal information to any other company, unless you have given us permission to do so.

### **How long your personal data will be kept**

We will keep your personal data after we have finished acting for you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy. When it is no longer necessary to retain your personal data, we will delete it. In some circumstances, you can ask us to delete your data: see **Your Rights** below for further information.

We may anonymize your personal data so that it can no longer be associated with you for research

or statistical purposes. If we do that, we may use this information indefinitely without further notice to you.

### **Your rights**

You have the right to request copies of, and access to, your personal information, correct your personal information, delete personal data, and request that we stop sending you any direct marketing communications. Each communication you receive will provide instructions as to how to opt-out of receiving similar communications.

### **Where your personal data is held**

Information may be held at our offices and those of our third-party agencies, service providers, representatives, and sometimes agents.

We maintain your data in the United States of America and many of our third-party agencies, service providers, representatives, and agents are based in the United States of America. If you are from the European Union or European Economic Area, processing of your personal data will involve a transfer of data outside the European Union or European Economic Area. We ensure protection is afforded to your data by ensuring at least one of the following safeguards is implemented:

- We use providers based in the USA which are part of the Privacy Shield, requiring them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).
- If we are using non-USA providers, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- On rare occasions where we may use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EU or EEA.

## **Safeguards and Notification**

imbrex.io uses physical, electronic, and procedural safeguards to protect against the unauthorized use, disclosure, modification, destruction, or theft of any of your personal information under our control.

The safety and security of your information also depends on you. Where we have given you, or where you have chosen, a password or key for access to certain parts of our website or services, you are responsible for keeping this password or key confidential. We ask you not to share your password or key with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the website.

As required by any applicable law, imbrex.io will notify affected individuals of any breach of its security measures involving personal information under its control if it is reasonable to believe that the breach creates risk of significant harm to the individual. Such notice shall be made as soon as possible after imbrex determines that a breach has occurred.

It is our policy to post any changes we make to our privacy policy on this page. The date the privacy policy was last revised is identified at the top of the page. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account and/or through a notice on the website. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our website and this privacy policy to check for any changes.

## **External Links**

Our website may contain links to other sites for your convenience and information. If you access those links, you will leave the imbrex site. Imbrex is not responsible for the privacy practices or the content of other websites, and personal information collected by those sites is not covered under this Privacy Policy.

## **Contacting Us**

If you have any questions about this Privacy Statement or if you wish to inspect the information we hold about you, please contact: [support@imbrex.io](mailto:support@imbrex.io)

# COOKIE POLICY

## 1. WHAT THIS POLICY COVERS

This Cookie Policy sets out:

- what a cookie is (paragraph 2);
- an overview of the cookies we use (paragraph 3);
- what you can do if you do not agree to the cookie use (paragraph 4);
- further information about cookies in general (paragraph 5); and
- a detailed table setting out all of the cookies that we use (paragraph 6).

By continuing to use our website, you are agreeing to our using cookies in the manner set out in this Cookie Policy so please read it carefully.

If you do not wish to accept cookies in connection with your use of this Website, you should stop using our site or turn off your cookies (see paragraph 4 below for how to do this) but this may affect the functionality of the Website.

## 2. WHAT IS A COOKIE?

After you submit the age-gate form and enter the Website, the Website will make use of so-called "cookies". Cookies are small text files containing small amounts of information which are downloaded and may be stored on your user device e.g. your computer (or other internet enabled devices, such as a smartphone or tablet). This Cookie Policy provides you with information about the cookies we use and why. Our Privacy Policy sets out full details of the other information we may collect and how we may use your personal information.

## 3. COOKIES USED ON THE WEBSITE

We use performance cookies, specifically Facebook, Google Analytics; however, we're going to list the other types of cookies, as we may employ them in the future. We'll update this document when we make changes and will notify users when these updates are made. Some of these are session cookies which are temporary and allow us to link your actions during a browser session. Others are persistent cookies which remain on your device for the period of time specified in the cookie. The Website uses cookies for the following purposes:

- NECESSARY COOKIES

Necessary cookies are essential to help users navigate Websites.

- FUNCTIONALITY COOKIES

Functionality cookies are used to provide you the best user experience. An example might be that our website recognizes if the user has already signed up for our newsletter or if the user is seeing a certain page for the first time.

- PERFORMANCE COOKIES

Performance cookies help us to understand the behavior of our visitors and the usage of the Website. These cookies are used to help us understand what interests our users, and measure how effective our advertising is. Some of these cookies are managed by third parties, and you may refer to the third parties' own website privacy notifications for further information. In particular, we use Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes and to help improve the overall experience on our website.

We use Google Analytics, a third-party web analysis service provided by Google Inc, which uses "performance cookies" and "targeting cookies" to analyze how you use the Website. The information generated by the cookie about your use of the Website (including your IP address) will be transmitted to and stored by Google on servers in the United States. However, this website uses Google Analytics with the expansion '\_anonymizeIp()' which means that Google will truncate/ anonymize the last octet of the IP address for Member States of the European Union.

On behalf of us, Google will use the information collected for the purpose of evaluating your use of our Website, compiling reports on website activity and providing other services relating to website activity and internet usage to us. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser as described above. Furthermore, you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB#>. You may disable the use of Google Analytics by using the link [disable Google Analytics](#). This link creates an opt-out cookie which prevents the further processing of your data. For more information about Google Analytics cookies, please see Google's help pages and privacy policy:

[Google's Privacy Policy](#)

[Google Analytics Help pages.](#)

By using our Website, you agree that we may store and access these cookies on your device. Accepting these cookies is a condition of using the Website, so if you prevent them we cannot guarantee how our site will perform for you.

- COMMUNICATION COOKIES

The Website allows cookies of third-party social networks (e.g. Facebook, YouTube, Twitter, LinkedIn). This enables a user to share content of the Website on social networks. These third parties may use cookies, but their use of cookies will not be governed by this Cookie Policy.

- ADVERTISING COOKIES

Advertising cookies will remember your product and page preferences and in general that you visited the Website. We strive to provide you with advertisements relevant to you and your interests on other online platforms, where available. These cookies are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of advertisements.

#### 4. CONTROL YOUR COOKIE SETTINGS

Once you have given us your agreement to the use of cookies, we shall store a cookie on your computer or device to remember this for next time. If you wish to withdraw your agreement at any time, you will need to delete our cookies using your internet browser settings. You should do this through the browser settings for each browser you use. Please be aware that some of our services will not function if your browser does not accept cookies. However, you can allow cookies from specific websites by making them “trusted websites” in your internet browser. The following links may assist you in managing your cookies settings, or you can use the 'Help' option in your internet browser for more details.

Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Cookies>

Google Chrome: <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>

Safari: <http://support.apple.com/kb/PH5042>

Opera: <http://www.opera.com/help/tutorials/security/privacy/>

Adobe (flash cookies): <https://www.adobe.com/support/flash/downloads.html>

To block Google Analytics cookies specifically, you can install the “Google Analytics Opt-out Browser Add-on” provided by Google.

#### 5. OTHER INFORMATION

The following link contains further information about cookies: <http://www.aboutcookies.org>. In addition, a guide to online privacy has been produced by the internet advertising industry which can be found:

<http://www.youronlinechoices.eu>

<http://www.aboutads.info>

## COOKIE USE

Below is a regularly updated list of the cookies used.

*Disclaimer:* Please note that cookies may also refer to data stored in the html5 *localStorage* and *flash*, though we don't use *flash* in our application. Please also note that while we aim to be exhaustive, a vast majority of cookies set are by services we use and, as such, can be added to or removed from at a moment's notice without our attention.

### 1. Necessary cookies

NAME	PERSISTENCY	DESCRIPTION	SOURCE
registrationToken	indefinitely	This <i>localStorage</i> item is used for tracking user permissions in the imbrex system	imbrex.io
role	indefinitely	This <i>localStorage</i> item is used for monitoring user preferences in the imbrex system	imbrex.io

### 2. Performance cookies

NAME	PERSISTENCY	DESCRIPTION	SOURCE
segmentio.#.ack	indefinitely	This <i>localStorage</i> item is used for identifying users over time	Segment.io
segmentio.#.InProgress	indefinitely	This <i>localStorage</i> item is used to track analytics data	Segment.io
segmentio.#.queue	indefinitely	This <i>localStorage</i> item is used to track analytics data	Segment.io
segmentio.#.reclaimEnd	indefinitely	This <i>localStorage</i> item is used to track analytics data	Segment.io
segmentio.#.reclaimStart	indefinitely	This <i>localStorage</i> item is used to track analytics data	Segment.io

NAME	PERSISTENCY	DESCRIPTION	SOURCE
ajs_group_properties	indefinitely	This <i>localStorage</i> item is used to track analytics data	Segment.io
ajs_user_traits	indefinitely	This <i>localStorage</i> item is used to track analytics data	Segment.io
Ajs_anonymous_id, ajs_group_id, ajs_user_id	1 year	This cookie is set by Segment.io to track analytics data	Segment.io
APISID, SAPISID, SSID	2 years	This cookie is used by Google to measure the usage of a google tools like Google Maps	Google
__cfduid	1 year	This cookie is set by Cloudflare to identify individual clients behind a shared IP address and apply security settings on a per-client basis	Cloudflare
NID	6 months	This cookie is set by Google to track user preferences	Google
SIDCC	3 months	This security cookie is set by google to authenticate users	Google
SID, HSID	1 years	This security cookie is set by google to authenticate users	Google
_drip_client_#	2 years	This cookie is set by Segment to remember previous actions taken by a page during a session	Segment.io

<b>NAME</b>	<b>PERSISTENCY</b>	<b>DESCRIPTION</b>	<b>SOURCE</b>
_ga	2 years	This cookie is set by Google Analytics to identify a user for analytics purposes	Google
_gi	1 day	This cookie is set by Google Analytics to identify unique users between sessions	Google
_tccl_visitor	1 year	The cookie is set by GoDaddy to track website user activity over time	GoDaddy
amplitude_id_#, amplitude_idundefinedsegment.com	10 years	These cookies are set by Amplitude for session tracking for analytics purposes	Amplitude via Segment.io
mkjs_group_id, mkjs_user_id	1 year	These cookies are set by Segment.io for recording website analytics.	Segment
Seg_xid, seg_xid_fd, sig_xid_ts	1 year	These cookies are set by Segment.io for statistical and analytical purposes for increasing performance of our service	Segment

### **3. Communication cookies**

*No cookies of this type.*

#### 4. Advertising cookies

NAME	PERSISTENCY	DESCRIPTION	SOURCE
_fbp	1 hour	Facebook uses this cookie to delivery, measure, and improve the relevancy of ads in their system	Facebook
1P_JAR	1 month	Google advertising cookie for user tracking and ad targeting purposes on other systems	Google
APISID	2 years	Google advertising cookie for user monitoring and ad targeting purposes on other systems	Google via DoubleClick
__qca	1 year, 1 month	This cookie is set by Segment for audience segmentation and targeted advertising on other systems	Quantcast via Segment.io
fr	3 months	Facebook sets this cookie to identify the user and the browser for advertising purposes	Facebook
sb	2 years	Facebook sets this cookie to track user activity for the purpose of suggestions	Facebook
DSID	2 weeks	Google sets this cookie for advertisements they server across the web.	Google