

# PRIVACY POLICY

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Effective [01.01.2022]

## WELCOME!

This Privacy Policy is here to help you understand how we collect, use, disclose, and process your Personal Data (as defined below). We also describe your choices and rights with respect to how we process that Personal Data. Please read this policy carefully.

## WHO WE ARE

This is the Privacy Policy (“**Policy**”) of SponsorCX, Inc. (“**Company**”, “**us**”, “**our**”, or “**we**”), a Delaware corporation with offices at 395 S. Main Street, Suite 107, Alpine, UT 84004. You can contact us using the information below.

## SCOPE & ACKNOWLEDGEMENT

This Policy applies to our “**Services**” which include our website at sponsorcx.com (including any subdomains or mobile versions the “**Corporate Site**”), our SponsorCX web platform and mobile applications (“**Platform**”) and any other website or services where this Privacy Policy is posted.

Our Platform allows our clients (“**Clients**”) and their users (“**Client Users**”) to track, manage, and analyze Client sponsorship and sales accounts, manage sponsorship projects and assets, and communicate and collaborate with Clients’ third party sponsors (“**Sponsors**”) and their users (“**Sponsor Users**”). Whether you are a Sponsor User or a Client User (“**User(s)**”), your information will be processed under this Privacy Policy.

**Your use of our Services indicates your acknowledgement of the practices described in this Policy.**

## ADDITIONAL TERMS

This Policy is incorporated into the [Terms of Use](#) governing your use of our Services. Any capitalized term not defined in this Policy will have the definition provided in our [Terms of Use](#). If you are a Client or Sponsor, you may be subject to additional terms relating to your subscription to or use of the Services, such as a Subscription Agreement or End User License Agreement.

This Policy reflects only how we process Personal Data through our Services. This Policy does not apply to information processed by other third parties, for example, when you visit a third-party website or interact with third-party services, unless those parties collect or process information on our behalf. Please review any relevant third party’s privacy policy for information regarding their privacy practices.

## COLLECTION AND USE OF PERSONAL DATA

### *Personal Data We Collect*

In order to provide our Services, we may collect and process information that relates to identified or identifiable individuals (“**Personal Data**”). We collect and process the following categories of Personal Data (note, specific Personal Data elements are examples and may change):

- Identity Data:* Personal Data about you and your identity, such as your name, username, profile data, and other Personal Data you may provide on registration forms or as part of an account profile.
- Contact Data:* Identity Data used to contact an individual, e.g. email address, physical address, or phone number.
- Device Data:* Personal Data relating to your device, browser, or application e.g. IP addresses, MAC addresses, application ID/AdID/IDFA, identifiers from cookies, session history and similar browsing metadata, and other data generated through applications and browsers, including via cookies and similar technologies.
- Usage Data.* Data about your activity on and use of our Services, such as site and app performance data, browsing metadata; search history; device and software interactions; User navigation flows; clickstream data; software and device crash data, performance and other diagnostic data; and other device connectivity and usage data.

*User Content:* Personal Data included in content provided by Users of the Service in any free-form or unstructured format, such as in a “contact us” box, free text field, in a photo, file or document, or messages.

### ***How We Collect Personal Data***

We collect Personal Data from various sources based on the context in which the Personal Data will be processed:

*You:* We collect Personal Data from you directly, for example, when you input information into an online form, sign up for a list, or contact us directly.

*Your Devices:* We may collect certain Personal Data automatically from your devices. For example, we collect Device Data automatically using cookies and similar technologies when you use access our Corporate Sites or when you open our marketing communications.

*Clients:* We may process Personal Data from our Clients with whom we have a relationship, and who may provide us, or grant us access to systems providing, information about Users, personnel, account information, etc.

*Service Providers:* We receive Personal Data from third parties with whom we have a relationship in connection with their performance of services or processing of transactions on our behalf.

*Data we create:* We (or third parties operating on our behalf) create and infer Personal Data based on our observations or analysis of other Personal Data we process, and we may correlate this data with other data we process about you.

### ***How we Process Personal Data***

#### **Account Registration**

When Users create an account on our Service, we process certain Personal Data, which typically includes Identity Data, Device Data, and Contact Data. We use this Personal Data primarily to create, maintain, and provide you with important information about your account, and provide the features and services you request. We may use such Personal Data for marketing purposes where permitted by local laws (see below).

#### **Platform Use**

When you use our Service, we automatically collect and process Device Data and Usage Data. We use this data as necessary to initiate or fulfill your requests for certain features or functions through our Service, such as keeping you logged in, delivering pages, logging activities for security purposes, etc.

In addition to Device Data and Usage Data, we may also collect and process Contact Data and Identity Data that we collect, create, and/or receive (including through the use of cookies and similar technologies, subject to any necessary consents required under applicable law). For more information, please review our Cookies and Similar Technologies section below.

#### **Messaging & Collaboration Tools**

On behalf of the Clients, we process Identity Data, Contact Data, and if provided, User Content when Users use our Services to collaborate between Sponsors and Clients, track fulfillment, comment on Sponsor/Client workflows, edit Sponsor opportunities, sales leads, or projects, use our messaging features, or if otherwise submit any User Content (e.g. via the artwork approval processes).

We use this Personal Data as necessary to provide the Services and features that Users use, and carry out Users’ requests. Subject to Users’ rights and choices, we may also use this data to improve our Services or in connection with marketing communications, each as described further below.

Additionally, if you enable or allow notifications, we may provide notifications through our mobile application relating to events that occur on the Platform, such as completed items, new messages, or other requests. You can control notifications through the settings menus in the application or on your mobile device.

Note: Messages and comments, including any Identity Data, Contact Data, or User Content sent from one User to another or uploaded to the Services, including messages between Sponsor Users and Client Users, may be disclosed to the User(s) to whom the message/comment was directed, but may be available to other Users of the Client or Sponsor

associated with the sender's or recipient's account. We do not screen messages, comments, or other postings for personal or inappropriate content.

### **Marketing Communications**

We may process Identity Data, Device Data and Contact Data in connection with email marketing communications (such as promotional emails), which you might receive if you register for an account, choose to receive marketing communications, or engage in a transaction allowing us to send you marketing communications. We may also automatically collect Device Data when you open or interact with those marketing communications.

Subject to Users' rights & choices, we use Identity Data and Contact Data as necessary to customize, deliver, and otherwise process marketing communications, and in order to tailor certain communications to individuals' preferences and requests. Additionally, we may process Device Data from devices receiving those marketing communications as part of our business interests in understanding whether our emails are opened or other aspects of engagement with such marketing communications.

### **Feedback and Surveys**

We generally process Identity Data, Contact Data, and User Content collected in connection with customer surveys or questionnaires. We generally process this Personal Data as necessary to respond to customer requests/concerns, to create aggregate analytics regarding customer satisfaction, and to improve our services. We may also store and analyze feedback for our purposes, for example, to personalize our Service.

### **Contact Us**

When you contact us through the Services using a contact us box, through our chat, or via email, we process Personal Data such as Identity Data, Device Data, and any Personal Data contained within any User Content. We use Identity Data, Contact Data, and User Content as necessary to communicate with you about the subject matter of your request and related matters. We may use such Personal Data for marketing purposes where permitted by local laws (see below) and relevant to the subject matter or your inquiry.

### **Cookies and Similar Tracking Technologies**

We, and certain third parties, automatically collect and process Identity Data, Usage Data, and Device Data when you interact with cookies and similar technologies on our Services. We may receive this data from third parties to the extent allowed by the applicable partner. Please note that the privacy policies of third parties may also apply to these technologies and the Personal Data collected through them.

Subject to your rights & choices, we may use this information as follows:

- (i) for "essential" or "functional" purposes, such as to enable certain features of the Services, or keeping you logged in during your session;
- (ii) for "analytics" and "personalization" purposes, consistent with our business interests in analyzing Users' use of the Platform, or use by the Client or Sponsor on whose behalf you use the Platform. We use this data to understand how Users and Clients, Sponsors and Users use the Service, how the Service performs, how Users engage with and navigate through the Service, what sites Users visit before visiting our Service, how often they visit our Site, and other similar information, as well as to greet Users by name and modify the appearance of the Service to usage history, tailor the Service based on geographic location, and understand characteristics of Users in certain locations; and
- (iii) on our Corporate Site, for "retargeting," social media, or targeted advertising purposes, so that we can deliver advertisements from us on other websites or social media. These technologies and the data they collect, may be used by advertisers or third parties to deliver ads that are more relevant to you based on content you have viewed, including content on our Corporate Site, and may do so based on inferred preferences and demographics. These technologies may collect information when you share information using a social media service, or engage with our content on or through a social media service. These tracking technologies may also help prevent you from seeing the same advertisements too many times and help us understand whether you have interacted with or viewed ads delivered to you. This collection and ad targeting takes place both on our Corporate Site and on third-party websites or services, or third parties participating in an ad network, e.g., when our advertisements are delivered by an ad network on a third-party website.

*Note:* Some of these technologies can be used to identify you across platforms, devices, sites, and services.

### ***Business Purposes of Processing***

In addition to the processing described above, we generally process any Personal Data we collect or create for several common business purposes. For example, we process your Personal Data as follows:

#### **Operate our Services and Fulfill Obligations**

We process any Personal Data as is necessary to provide the Services, and as otherwise necessary to fulfill our obligations to you, e.g. to provide you with the information, features, and services you request.

#### **Internal Processes and Service Improvement**

We may use any Personal Data we process through our Services as necessary in connection with our improvement of the design of our Services, understanding how our Services are used or function, for customer service purposes, in connection with the creation and analysis of logs and metadata relating to service use, and for ensuring the security and stability of the Services. Additionally, we may use Personal Data to understand what parts of our Service are most relevant to Users, how Users interact with various aspects of our Services, how our Services perform or fail to perform, etc., or we may analyze use of the Services to determine if there are specific activities that might indicate an information security risk to the Services or our Users. This processing is subject to Users' rights and choices.

#### **Aggregate Analytics**

We process Personal Data as necessary in connection with our creation of aggregate analytics relating to how Clients, Sponsors, and Users use our Services, such as the products and services used, service delivery metrics, Client/Sponsor trends, and to create other reports regarding the use of our Services and other similar information and metrics. The resulting aggregate data will not contain information from which and User, Sponsor, or Client may be readily identified.

#### **Compliance, Safety & Public Interest**

Note that we may, without your consent or further notice to you, and to the extent required or permitted by law, process any Personal Data subject to this Policy for purposes determined to be in the public interest or otherwise required by law. For example, we may process information as necessary to fulfil our legal obligations, to protect the vital interests of any individuals, or otherwise in the public interest or as required by a public authority. Please see the data sharing section for more information about how we disclose Personal Data in extraordinary circumstances.

#### **Other Processing of Personal Data**

If we process Personal Data in connection with our Services in a way not described in this Policy, this Policy will still apply generally (e.g. with respect to Users' rights and choices) unless otherwise stated when you provide it.

### **DATA SHARING**

Information we collect may be shared with a variety of parties, depending upon the purpose for and context in which that information was provided. We generally transfer data to the categories of recipients or in connection with specific business purposes, each described below.

#### **Service Providers**

In connection with our general business operations, product/service improvements, to enable certain features, and in connection with our other lawful business interests, we may share Personal Data with service providers or subprocessors who provide certain services or process data on our behalf. For example, we may use cloud-based hosting providers to host our Services or disclose information as part of our own internal operations, such as security operations, internal research, etc.)

#### **Corporate Events**

Your Personal Data may be processed in the event that we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

#### **Affiliates**

In order to streamline certain business operations, share promotions and content we believe would be of interest to you, and develop products and services that better meet the interests and needs of our customers, we may share your Personal Data with any of our current or future affiliated entities, subsidiaries, and parent companies.

## Legal Disclosures

In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use or a customer agreement, or in the vital interests of us or any person. Note, these disclosures may be made to governments that do not ensure the same degree of protection of your Personal Data as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Data to such parties.

## YOUR RIGHTS & CHOICES

### *Your Rights*

Applicable law may grant you rights in your Personal Data. These rights vary based on your location, state/country of residence, and may be limited by or subject to our own rights in your Personal Data. You may contact us with respect to rights requests at [privacy@sponsorcx.com](mailto:privacy@sponsorcx.com).

All rights requests we receive directly must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Data. We may require that you log in to your account or verify that you have access to your account or the email on file in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf.

For information regarding Californians Privacy Rights under the CCPA (if you are a California resident), please see below.

**Note:** We are able to fulfill rights requests regarding Personal Data that we control or process. Please contact the Client, Sponsor, or other appropriate third party directly to exercise your rights in information controlled by those parties.

### *Your Choices*

You may have the following choices regarding the Personal Data we process, to the extent required under applicable law:

- Consent:* If you consent to processing, you may withdraw your consent at any time. You may be required to close your account in order to withdraw consent where your consent is necessary to perform essential aspects of our Services.
- Direct Marketing:* You have the choice to opt-out of or withdraw your consent to marketing communications. You may have a legal right not to receive such messages in certain circumstances, in which case, you will only receive direct marketing communications if you consent. You may exercise your choice via the links in our communications or by contacting us re: direct marketing.
- Cookies & Similar Tech:* If you do not want information collected through the use of cookies and similar technologies, you can manage/deny cookies and certain similar technologies using your browser's settings menu. You must opt out of the use of some third party services directly via the third party. For example, to opt-out of Google's analytic services, please see the [Google Analytics Opt-out](#).
- Other Processing:* You may have the right under applicable law to object to our processing of your Personal Data for certain purposes, including without limitation, situations where we process in accordance with our business interests. You may do so by contacting us re: data rights requests. Note that we may not be required to cease processing based solely on your objection.

## SECURITY

We implement and maintain reasonable security measures to safeguard the Personal Data you provide us. However, we sometimes share Personal Data with third parties as noted above, and though we may enter contracts to help ensure security, we do control third parties' security processes. We do not warrant perfect security and we do not provide any guarantee that your Personal Data or any other information you provide us will remain secure.

## DATA RETENTION

We retain information for so long as it, in our discretion, remains relevant to its purpose, and in any event, for so long as is required by law. We will review retention periods periodically, and may sometimes pseudonymize or anonymize data held for longer periods, if appropriate.

## **MINORS**

Our Services are neither directed at nor intended for use by individuals under the age of 21. Further, we do not knowingly collect Personal Data from such individuals. If we learn that we have inadvertently done so, we will promptly delete it.

## **INTERNATIONAL TRANSFERS**

We operate in and use service providers located in the United States. If you are located outside the U.S., your Personal Data may be transferred to the U.S. The U.S. may not provide the same legal protections guaranteed to Personal Data in foreign countries. Contact us for more information regarding transfers of data to the U.S.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

Under the California Consumer Privacy Act (“CCPA”) and other California laws, California residents may have the following rights, subject to your submission of an appropriately verified request (see below for verification requirements):

### *Privacy Rights*

#### **Right to Know**

You may have the right to request any of following, for the 12 month period preceding your request: (1) the categories of Personal Data we have collected about you, or that we have sold, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the business or commercial purpose for which we collected or sold your Personal Data; (4) the categories of third parties to whom we have sold your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.

#### **Right to Delete**

You may have the right to delete certain Personal Data that we hold about you, subject to exceptions under applicable law.

#### **Right to Non-Discrimination**

You may have the right to not to receive discriminatory treatment as a result of your exercise of any rights conferred by the CCPA.

#### **Direct Marketing**

You may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes (if any) during the preceding calendar year.

#### **Opt-Out of Sale**

At this time, we do not sell Personal Data. If we engage in sales of Personal Data in the future (as defined by applicable law), you may direct us to stop selling or disclosing Personal Data to third parties for commercial purposes.

### *Submission of Rights Requests*

You may submit rights requests to us at [privacy@sponsorcx.com](mailto:privacy@sponsorcx.com). You may be required to provide additional verification information in order to complete your request, as described below.

### *Verification of Rights Requests*

All rights requests must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Data. We may require that you provide the email address we have on file for you (and verify that you can access that email account) and we may request additional information such as an address, phone number, or other data we have on file, in order to verify your identity. Depending on the sensitivity of the Personal Data you request and what type of request you submit, we may request additional information from you. If an agent is submitting the request on your behalf, we reserve the right to validate the agent’s authority to act on your behalf.

### *Supplemental Data Processing Disclosures*

#### **Categories of Personal Data Disclosed for Business Purposes**

For purposes of the CCPA, we may disclose to Service Providers for “business purposes” the following categories of Personal Data: Identity Data, Contact Data, Device Data, Usage Data, Audio/Visual Data, and User Content.

## **Data Sale**

For purposes of the CCPA, we do not “sell” your Personal Data.

## **CHANGES TO OUR POLICY**

We may change this Policy from time to time. Please visit this page regularly so that you are aware of our latest updates. Your use of the Services following notice of any changes indicates acceptance of any changes.

## **CONTACT US**

Feel free to contact us with questions or concerns using the appropriate address below.

*General inquires:* [admin@sponsorcx.com](mailto:admin@sponsorcx.com)

*Privacy Rights & Compliance:* [privacy@sponsorcx.com](mailto:privacy@sponsorcx.com)