

Privacy Policy

Last Updated: April 10, 2020

SocialChorus, Inc. ("**SocialChorus**") provides a service that connects organizations with their employees. This Privacy Policy explains how SocialChorus collects, uses, and discloses information about you through its platform, websites, mobile applications and other online services that link to this Privacy Policy (collectively, the "**Services**"). This Privacy Policy explains how SocialChorus collects, uses, and discloses information when you interact with a SocialChorus-branded Service for certain purposes and does not cover the data practices of customers that use SocialChorus technology to collect information from or about their employees. Please visit the privacy policy of your employer to learn about your employer's data practices with respect to the information they collect using SocialChorus technology.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to review the Privacy Policy whenever you access the Services or otherwise interact with us to stay informed about our information practices and the choices available to you.

Collection of Information

Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you create an account with us or sign up to use our Services, participate in any interactive features of the Services, fill out a form, take a product development survey, purchase our Services, apply for a job, communicate with us via third-party social media sites, request customer support or otherwise communicate with us. The types of information we may collect include your name, email address, phone number, company, role, and any other information you choose to provide.

Information About Your Use of the Services

Automatically Collected Information

When you access or use our Services, we automatically collect information about you, including:

- **Log Information:** We collect log information about your use of the Services, including the type of browser you use, app version, access times, page viewed, your IP address and the page you visited before navigating to our Services.

- **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Information Collected by Cookies and Other Tracking Technologies:** We use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular and count visits. Web beacons are electronic images that may be used in our Services and help deliver cookies, count visits and understand usage. For more information about cookies and how to disable them, please see “Your Choices” below.

Use of Information

We use the information we collect to provide, maintain, and improve our Services, such as to deliver and customize the Services, administer customers’ accounts, and communicate with customers about our Services and other products or services that may be of interest.

Sharing of Information

We may share information we collect as follows or as otherwise described in this Privacy Policy:

- With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of SocialChorus or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among SocialChorus and our current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and
- With your consent or at your direction. We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

Advertising and Analytics Services Provided by Others

We may allow others to provide analytics services and serve advertisements on our behalf across the internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used by SocialChorus and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices

Security

SocialChorus takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

Data Retention

We store the information we collect about you for as long as is necessary for the purpose(s) for which we originally collected it. We may retain certain information for legitimate business purposes or as required by law

Transfer of Information to the U.S. and Other Countries

SocialChorus is based in the United States and we process and store information in the U.S.. SocialChorus will not provide information to any persons located outside of the United States without first obtaining the written consent from your Company. Information may be accessed from the United Kingdom by employees of SocialChorus.

Questions or Complaints

SocialChorus complies with the EU - U.S. Privacy Shield Framework and the Swiss - U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. SocialChorus has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. When SocialChorus uses service providers to process personal information received in reliance on the Privacy Shield Principles, SocialChorus is responsible if that service provider processes personal data in violation of the Privacy Shield Principles (unless SocialChorus can prove that it is not responsible for the service provider's action that violated the Privacy Shield Principles). If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Framework and its Principles, and to view SocialChorus' certification, please visit <https://www.privacyshield.gov/>. Social Chorus is subject to the investigatory and enforcement powers of the United States Federal Trade Commission. Additionally, in compliance with the EU - U.S. Privacy Shield and the Swiss - U.S. Privacy Shield Frameworks, SocialChorus commits to resolve complaints about customer privacy and the collection or use of personal data. SocialChorus has further committed to refer unresolved privacy complaints under the EU - U.S. Privacy Shield and the Swiss - U.S. Privacy Shield Principles to JAMS, an independent alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint, or if the complaint is not satisfactorily addressed, please visit <https://www.jamsadr.com/eu-us-privacy-shield> for more information and to file a complaint. If the complaint is not resolved by contacting SocialChorus or through the independent dispute resolution process, you may choose to invoke binding arbitration before the Privacy Shield Panel created by the U.S. Department of Commerce and the European Commission or may contact your local Data Protection Authority.

Your Choices

You must contact your employer to update, correct or delete the information your employer collects about you using our services. If you are unable to do so, please contact us at the address below.

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Services

Contact Us

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

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