

Socio Privacy Policy

Last Revised: December 27, 2019

Your privacy is important to us. Socio Labs, Inc. and its subsidiaries and affiliates (“Socio,” “we,” or “us”), understand your concerns with regard to how information about you is used and shared, and we appreciate your trust that we will use and share information about you carefully and sensibly.

Socio provides event technology to organizations and individuals for their meetings, events, conferences, and trade shows (the “Services”). The Services include access to the <https://socio.events> website; any subdomains of such website, including Socio Platform (<https://platform.socio.events>), Live Display (<https://socio.live>); Mobile Apps; Branded Event Apps; Socio Event App; our Web Apps (<https://app.socio.events>), and any other website pages on which Services are provided by us (the “Apps”).

This Privacy Policy applies to your use of the Services and Apps, whether you are a customer or an end user of the Services. This Privacy Policy applies to information we collect through your use of the Apps and any other means by which we may collect information about you. This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit our Apps or use our Services in general, and our practices for collecting, using, maintaining, protecting and disclosing that information.

By accessing or using our Apps, using our Services, or contacting us, you acknowledge that you have read, understood, and agree to the practices as described in this Privacy Policy. If you are an end user, you acknowledge that we will share your information, including personal information, with our clients as described in this Privacy Policy for the purpose of providing the Services. This Privacy Policy may change from time to time (see [Changes to our Privacy Policy](#) below). Your continued use of the Apps or Services after we make changes is deemed to be acceptance of those changes, so please check our Privacy Policy periodically for updates.

Click on the links below to jump to each section:

When do we collect your information?

What information do we collect?

How do we use your personal information?

Do we disclose any information to outside parties?

What choices do you have about your personal information?

Do we transfer your personal information across geographies?

How long do we retain your personal information?

Third party links

How do we protect your information?

Individuals within the European Union

Your California privacy rights

Do we collect information from children?

Contacting us

Changes to our Privacy Policy

When do we collect your information?

Socio collects information relating to you and your use of the Apps in order to provide Services and features that are easy to use and responsive to your needs. Socio collects personal information in the following ways:

- **From you when you register an account and communicate with us.** We collect information from you when you register an account with us, request information, send us email, send us postal mail, or speak with us on the telephone. When you register an account with us, you will be prompted to give your consent to our processing of your personal data. By indicating your consent, you expressly authorize Socio to collect and process your personal data consistent with the purposes described in this Privacy Policy.
- **From the Apps.** We may collect information from your mobile device when our Apps are installed on your mobile device or you provide your information to us via the Apps. When you install our Apps on your mobile device and sign up, you will be prompted to give your consent to our processing of your personal data. By indicating your consent, you expressly authorize Socio to collect and process your personal data consistent with the purposes described in this Privacy Policy.
- **From third parties.** If you are an end user, we may receive information about you from a client, and we may collect information from your social media accounts if you choose to give us permission to access your social media accounts.
- **Automatically as you navigate the Apps.** Information collected automatically may include usage details, email address, IP addresses, and information collected through cookies and other tracking technologies.

What information do we collect?

Information you provide to us

When you provide personal information to us, we use it for the purposes for which it was provided to us as stated at the point of collection or as obvious from the context of collection. For example, if you send us an email requesting information, we will use your personal information to respond to your request. We may collect the following information:

- First and last name
- Phone number
- Email address
- Mailing address
- Biographical information
- External social network credentials
- Title
- Company
- Photograph

Information we and our third party service providers collect

When you use our Apps, we and our third party service providers automatically collect information about how you access and use the Apps and information about the device you use to access the Apps. We typically collect this information through a variety of tools, including cookies, web beacons, pixels, social media widgets, other tools to enable data recording and indexing, and similar technology (collectively, “tracking technologies”). We and our third party partners may automatically collect such information as:

- IP address
- Device type
- Browser type
- Operating system or platform
- Name of Internet service provider
- Referring website
- Exiting website
- Pages visited on the Apps
- Frequency, time, date, and duration of your visit on our Apps
- Your location
- Whether you access our website from multiple devices
- Other interaction you may have on our Apps
- Device Unique Device Identifier (e.g., Unique Device Identifier (UDID) or International Mobile Equipment Identity (IMEI))
- Mobile device MAC or IP address
- Information about your mobile carrier
- Communications relating to customer support, and information drawn from such communications, for statistical and reference

How do we use your personal information?

Providing services to you

We process personal information in order to provide Services to you and additional Services you request, as well as to respond to communications from you. The precise purposes for which your personal information is processed will be determined by the request, and by applicable laws, regulatory guidance, and professional standards.

Conducting data analytics and supporting our Apps

We use information we collect from you and information that we collect automatically to manage and improve our Apps and our business. We take steps to ensure that your rights and the legitimacy of Socio's activities are safeguarded. For example, Socio may use your de-identified information and combine it with the de-identified information of others to generate statistics as a source of data for our products. For example, we use information to:

- **To monitor, analyze, and improve services and our Apps' performance and functionality.** For example, we analyze user behavior and conduct research and analysis about the way you and other users use our Apps or Services.
- **To manage risk and protect the Apps.** We use data to better protect our Services, our Apps, and you by helping to detect and prevent fraud and abuse of the Apps and our Services.
- **To market our own Services to you.** Information we collect about you and how you use the Apps and our Services provides valuable information about how we can improve and offer additional products and services that we think might interest you.
- **Conduct internal monitoring and training.**
- **Develop new services.**
- **Conduct processing necessary to fulfill other contractual obligations for you.**
- **To comply with our legal and regulatory obligations.** We will use your information as necessary to enforce the terms of our Apps and Services and to comply with all applicable laws and regulations.

Sometimes we may de-identify information by removing any identifier that can be associated with your personal information. De-identified information helps us develop reports and analyses about how our customers use our Apps and for other research such as research regarding behavioral inferences. We may share de-identified information and reports and analyses based on de-identified information publically and with other companies. . To further protect your privacy, de-identified information does not include contact information or any other information that would identify any specific individual or household.

Do we disclose any information to outside parties?

We do not sell, trade, or transfer your personal information to third parties, except in the circumstances described below.

Within Socio

We may share your personal information with other Socio entities, brands, divisions, and subsidiaries to serve you, including for the activities listed above.

Our Clients

Our clients that use our Services to create Apps for events, conferences, trade shows, and the like have full access to the users that attend their events and their personal information provided via the Apps. To understand how our clients are using your or other attendee data, please refer to our clients' own privacy policies. We have no responsibility or liability for the activities of our clients.

Other App Users

To the extent you provide personal information to us via our Apps, such information may be visible to and may be disclosed to other third-party users of our Apps, such as other event attendees, only with your express consent.

Socio, in some cases, provides to its end users a list of event attendees, including attendees who may or may not have signed up to use Socio's Services. As such, Socio's end users are able to send emails such other event attendees.

Third-Party Service Providers

We disclose personal information to advertisers, merchants, consumer and market research companies, service providers who help us provide services, or to other third-party service providers who provide certain specialized services to us, to provide services on our behalf, or who co-operate with us on projects. These business partners operate as separate controllers, and are responsible for their own compliance with data protection laws. These third-parties are contractually restricted from using or disclosing the information except as necessary to perform services or to comply with legal requirements.

We may disclose aggregated, de-identified information, and analyses and reports derived from such information to third parties including utilities, service providers, advertisers, merchants, consumer and market research companies and other organizations. If we have obtained your personal information from one of our clients, they may have the same access to your information as we do.

Legal Requirements and Business Transfers

We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other government official requests, (ii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iii) in connection with an investigation of a complaint, security threat, or suspected or actual illegal activity; (iv) in connection with an internal audit; or (v) in the event that Socio is subject to mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these types of transactions, personal information may be shared, sold, or transferred, and it may be used subsequently by a third party.

What choices do you have about your personal information?

We offer certain choices about how we communicate with you and what personal information we obtain about you and share with others. How can you update your information and communication preferences?

Profile

If you have created a profile or account on our Apps, you can update your contact information after you log into your account.

E-mail

You may unsubscribe from emails from us by clicking the Unsubscribe at the bottom of any promotional email from us. You may also contact us by e-mail or postal address as noted below. Please include your current contact information, the information you are interested in accessing, and your requested changes.

Cookies

We provide a variety of services on our Apps using cookies. We place cookies on your device in order to provide you with personalized access to essential services, enhance functionality, and to show you offers and services tailored to your interests.

A cookie is a small piece of data that a website can send to your browser, which may then be stored on your hard drive as a “tag” that identifies your computer. Cookies help to navigate from page to page on a website, provide secure connections, gather statistics about the usage and effectiveness of our site, and remembers preferences from a previous visit, when you return.

We use third-party services for analytics and interest-based advertising purposes. These service providers and ad partners may use cookies alone or in conjunction with unique identifiers, beacons, and other tracking technologies to collect information about you when you use our website, open our emails, or interact with our ads. We do not combine the information collected through the use of these services with information that directly identifies you.

Most web browsers automatically accept cookies, but you can change your browser’s settings to disable all or certain cookies if you wish. Please note that by disabling or deleting cookies, you may not be able to access the full functionality of our Apps. Disabling or clearing cookies also may affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you previously set.

Do Not Track

Because there currently is not an industry or legal standard for recognizing or honoring Do Not Track (“DNT”) signals, we do not respond to them at this time.

Do we transfer your personal information across geographies?

If you are in a country outside the United States, we may transfer personal information across geographical borders to Socio entities, authorized service providers, or business partners in other countries working on our behalf in accordance with applicable law. We, our affiliates, business partners, and other third parties may be based locally or in other countries outside of your own. . .

How long do we retain your personal information?

We will keep your personal information for the period necessary to fulfil the purposes described in this Privacy Policy or for a maximum of twenty years.

Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our Apps. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. We urge you to read the privacy policies of other websites before submitting any information to those websites.

How do we protect your information?

Socio has implemented reasonable physical, technical, and administrative security standards to protect personal information from loss, misuse, alteration, or destruction. We strive to protect your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information.

Our affiliates, business partners, and other third-parties are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose.

Individuals Within the European Union

Controllers of Personal Data

Socio Labs, Inc.
115 W. Washington Street
Suite 1190
Indianapolis, Indiana 46204
United States

is the data controller of the personal data processed through the Apps.

Legal Bases for Processing Personal Data

If you are an individual located in the European Union (EU), we collect and process personal data about you where we have a legal basis for doing so under applicable EU laws. This means we collect and process your data only when:

- it is necessary for a legitimate interest (which is not overridden by your individual privacy interests), such as preventing fraud, improving our Apps, and increasing the security of the website and network infrastructure;
- you have consented to this collection and processing for a specific purpose;
- it is necessary to fulfil our contractual obligations; or
- it is necessary to comply with a legal obligation.

Where we rely on your consent to process your personal data, you have the right to withdraw or decline consent at any time. Some examples of where we rely on your consent to process your

personal data include sending you marketing emails. If you wish to withdraw your consent, please contact us at privacy@socio.events.

Some examples of our legitimate interests for processing personal data include:

- app and network security;
- customer support;
- fraud prevention; or
- improving our Apps.

Where we rely on our legitimate interests to process your personal data, you may have the right to object. More information on exercising this right can be found in the Individual Rights section below.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us at privacy@socio.events.

Individual Rights

If you are located in the EU, you have certain rights under EU data protection law with respect to your personal data, including the right to request access to, correct, and delete your personal data. You may also have the right to receive a copy of your personal data in a commonly used and machine-readable format, and to transmit such data to another controller. You also may object to processing of your personal data, or ask that we restrict the processing of your personal data in certain instances.

To request deletion of, access to, or to make changes to your personal data, or to otherwise any of the rights in this section, please contact us at privacy@socio.events. Please note that not all requests can be honored.

Transfers, Storage, and Processing

Our Apps are operated from and hosted on servers located in the United States. If you access and use our website from a location outside of the United States, any personal data you provide to us or that is otherwise collected may be transferred to and processed in the United States or any other jurisdiction in our sole discretion. Users of our Apps should be aware that the laws that apply to the use and protection of personal data in the United States or other countries or jurisdictions to which we transfer, or in which we process, personal data may differ from those of your country of residence. Users who access or use our Apps from jurisdictions outside of the United States do so at their own choice and risk and are solely responsible for compliance with local law. While we take steps to safeguard your personal data, the United States has NOT been deemed by the European Commission to ensure an adequate level of protection for personal data. Accordingly, the level of protection provided in the United States or other non-EU countries and jurisdictions from which you may access our Apps may not be as stringent as that under EU data protection standards or the data protection laws of some other countries, possibly including your home jurisdiction.

If we are processing your personal data on behalf of another party, your personal data is transferred across borders to the United States or to other countries or jurisdictions in which we or our third-party associates may process personal data through the use of Standard Contract Clauses.

Unresolved Complaints

If you are a resident of the EU and your inquiry with us has not been satisfactorily addressed, or if you believe we are processing your personal data not in accordance with the law or this Privacy Policy, you may file a complaint with the supervisory authority in your country of residence.

Your California privacy rights

California Civil Code Section § 1798.83 permits users of our Apps that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to privacy@socio.events or write us at:

115 W. Washington Street
 Suite 1190
 Indianapolis, Indiana 46204
 United States

In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

Pursuant to applicable California law, including the California Consumer Privacy Act (CCPA), Socio makes the following disclosures regarding the personal information Socio has collected within the last 12 months:

<u>Category of Personal Information</u>	<u>Category of Source from Which Data is Collected</u>	<u>Purpose of Collection</u>	<u>Category of Third Parties to Whom Data is Disclosed</u>
Contact information such as first and last name, phone number, email address, mailing address	Directly from user	To provide our services and communicate with our users	Service Providers
Photograph	Directly from user	To populate and manage user profiles	Service Providers
Biographical information	Directly from user	To populate and manage user profiles	Service Providers

External social network credentials	Directly from user	To sync user accounts with social media accounts	Service Providers
Employment information	Directly from user	To populate and manage user profiles	Service Providers
Automatically collected information such as browser type, device type, IP address	Cookies and other tracking technologies	To conduct data analytics and support the Apps; to monitor, analyze, and improve services and our Apps' performance and functionality	Service Providers

Socio has not sold consumers' personal information in the twelve (12) months preceding the Effective Date of this Privacy Policy.

If you are a California resident, pursuant to the CCPA, you have the right to request:

- the categories of personal information Socio has collected about you;
- the categories of sources from which your personal information is collected;
- the business or commercial purpose of collecting or selling your personal information;
- the categories of third parties with whom Socio shares your personal information;
- the specific pieces of personal information Socio has collected about you;
- the categories of personal information that Socio has sold about you and the categories of third parties to whom the personal information was sold, if applicable;
- deletion of your personal information; and
- an opt out of having your personal information disclosed or sold to third parties.

To submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, please contact us at privacy@socio.events, (877) 336-2888, or complete the web form located at <https://help.socio.events/en/articles/3544290-submit-a-gdpr-or-ccpa-request>. To verify your identity when you submit a request, we will match the identifying information you provide to us to the personal information we have about you. If you have an account with us, we will also verify your identity through our existing authentication practices for your account.

Socio will not be required to comply with your request to delete your personal information if it is necessary for Socio to maintain your personal information in order to:

- complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of Socio's ongoing business relationship with you, or otherwise perform a contract between you and Socio;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- debug to identify and repair errors that impair existing intended functionality;
- exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;

- comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when Socio’s deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the Socio;
- comply with a legal obligation; or
- otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Socio will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:

- denying goods or services to you;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

This Policy is available to consumers with disabilities. To access this Policy in an alternative downloadable format, please click [here](#).

Do we collect information from children?

Our Apps are not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Apps. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on the Apps or on or through any of its features, use any of the interactive or public comment features of the Apps or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at privacy@socio.events.

Contacting us

For any questions, or to request further information regarding this Privacy Policy, please contact us at privacy@socio.events.

Changes to this Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by e-mail to the

primary e-mail address specified in your account and/or possibly through a notice on the Apps' home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Apps and this Privacy Policy to check for any changes.