

## **Insight68 Product Privacy Policy**

Last Modified: **August 20, 2020**

We at Insight68 (Insight68, Inc. and its Affiliates) are committed to protecting your privacy. This Product Privacy Policy applies to your use of the Insight68 Subscription Service as a customer of Insight68 Inc. This Product Privacy Policy describes how we collect, receive, use, store, share, transfer, and process your Personal Data. It also describes your choices regarding use, as well as your rights of access and correction of your Personal Data.

This Product Privacy Policy also describes how we process Customer Data on behalf of our customers in connection with the Insight68 Subscription Services. This Product Privacy Policy does not apply to any information or data collected by Insight68 as a controller for other purposes, such as information collected on our websites or through other channels for marketing purposes.

Insight68 processes Customer Data under the direction of our Customers, and has no direct control or ownership of the Personal Data we process on behalf of our customers. Customers are responsible for complying with any regulations or laws that require providing notice, disclosure, and/or obtaining consent prior to transferring the Personal Data to Insight68 for processing purposes. Terms not otherwise defined herein shall have the meaning as set forth in the Insight68 Customer Terms of Service. In the event of a conflict between this Product Privacy Policy and the Customer Terms of Service, the terms of the Customer Terms of Service will control.

We periodically update this Product Privacy Policy. We will post any changes on this page and, if the changes are material, we will provide an update through email or the notification app in your Insight68 account.

### **1. Use of the Subscription Service**

#### **A. The Insight68 Subscription Service**

Our online Subscription Service allows users (typically small to medium size businesses) to create and share marketing, sales and customer service content. The Subscription Service can also be used to help organize sales data about a company's sales pipeline (e.g., leads, customers, deals, etc.). The information added to the Subscription Service, either by site visitors providing their contact information or when a Subscription Service user adds the information, is stored and managed on our service providers' servers. Insight68 provides the Subscription Service to our customers for their own marketing, sales, CRM, and customer service needs.

#### **B. Use By Our Customers**

Our customers use the Subscription Service to build webpages that people can visit to learn more about their business. When customers use the Subscription Service, they may collect Personal Data such as first and last name, email address, physical address, or phone number. Insight68 does not control the content of these webpages or the types of Personal Data that our customers may choose to collect or manage using the Subscription Service. That Personal Data is controlled by them and is used, disclosed and protected by them according to their privacy policies.

Insight68 processes our customers' information as they direct and in accordance with our agreements with our customers, and we store it on our service providers' servers. Our agreements with our customers prohibit us from using that information, except as necessary to provide and improve the Subscription Service, as permitted by this Product Privacy Policy, and as required by law.

We have no direct relationship with individuals who provide Personal Information to our customers. Our customers control and are responsible for correcting, deleting or updating information they have collected from using the Subscription Service. We may work with our customers to help them provide notice to their visitors about their data collection, processing and usage.

## **2. How we Share Information we Collect**

### **A. With Service Providers**

We employ other third-party service providers to provide services on our behalf to visitors to our websites, our customers, and Users of the Subscription Service and may need to share your information with them to provide information, products or services to you. Examples may include analyzing data or performing statistical analysis, processing credit card payments, supplementing the information you provide us in order to provide you with better service, and providing customer service or support. These service providers are prohibited from using your Personal Data except for these purposes, and they are required to maintain the confidentiality of your information. In all cases where we share your information with such agents, we explicitly require the agent to acknowledge and adhere to our privacy and customer data handling policies.

### **B. Due to Corporate Events**

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by Insight68 on the websites and the Subscription Service. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Data, and choices you may have regarding your Personal Data.

### **C. In accordance with Compelled Disclosure**

We reserve the right to use or disclose your Personal Data if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

## **3. Insight68 Product Specific Privacy Disclosures**

### **A. All Product Tiers**

#### **(i) Third Parties**

We may provide links within our sites and services to the sites or services of third parties. We are not responsible for the collection, use, monitoring, storage or sharing of any Personal Data

by such third parties, and we encourage you to review those third parties' privacy notices and ask them questions about their privacy practices as they relate to you.

(ii) Data Practices and Service Data

We automatically collect metrics and information about how Users interact with and use the Subscription Service. We use this information to develop and improve the Subscription Services and the Consulting Services, and to inform our sales and marketing strategies. We may share or publish this service data with third parties in an aggregated and anonymized manner, but we will not include any Customer Data or identify Users.

If you access the Subscription Services via our mobile applications, we may also collect your device model and version, device identifier, and OS version. We may send you push notifications from time to time in order to update you about events or promotions. If you no longer wish to receive such communications, you may turn them off at the device level.

We use Customer Data in an anonymized manner for machine learning that supports certain product features and functionality within the Subscription Service.

When you use the Subscription Service, we automatically collect log files. These log files contain information about a User's IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times, and referring website addresses. We use this information to ensure the optimal operation of the Subscription Service and for security purposes. We may link log files to Personal Data such as name, email address, address, and phone number for these purposes.

(iii) Integrations with the Insight68 Platform

You may choose to connect any number of applications or integrations, including our certified partner applications, with your Insight68 account. If you give an integration provider access to your Insight68 account then your use of these integrations is subject to the service terms and privacy terms made available by that integrator. We are not responsible for third party integrators and in no case are such integration providers our sub-processors.

#### 4. Data Subject Requests

If you are a customer, prospect, or otherwise interact with one of our Customers and would no longer like to be contacted by one of our customers that use our Subscription Service, please contact the customer that you interact with directly. If you want to access, correct, amend, or delete data controlled by a Insight68 customer, you should direct your query to the Insight68 Customer (the data controller). We will work with customers to respond to data subject requests as outlined in our **DPA**.

You may request the deletion of your Insight68 account or Subscription Service by sending an email request. You should also review our DPA to understand our obligations as a processor of your data and how we comply with relevant data protection laws.

If you are seeking to exercise your data subject access rights for the data Insight68 processes as a controller, please see **this Privacy Policy**.

## 5. Data Retention

Customer Data collected during your use of the Subscription Service is retained in accordance with the provisions of the DPA and is retained for as long as you have a paid Subscription and/or remain an active customer in your portal. Your data is deleted upon your written request or after an established period following the termination of all customer agreements. In general, Customer Data is deleted after your paid Subscription ends and your portal becomes inactive.

## 6. How We Transfer Data We Collect Internationally

This Privacy Policy shall apply even if we transfer Personal Data to other countries. We have taken appropriate safeguards to require that your Personal Data will remain protected. When we share information about you within and among Insight68's Affiliates, we make use of standard contractual data protection clauses, which have been approved by the European Commission, and we rely on the EU-U.S. and Swiss-U.S. Privacy Shield Framework to safeguard the transfer of information we collect from the European Economic Area (EEA), the United Kingdom, and Switzerland. Please see our Privacy Shield notice below for more information.

### (i) International transfers to third parties

Some of the third parties described in this privacy policy, which provide services to us under contract, are based in other countries that may not have equivalent privacy and data protection laws to the country in which you reside. When we share information of customers in the European Economic Area or Switzerland, we make use of the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, European Commission-approved standard contractual data protection clauses, binding corporate rules for transfers to data processors, or other appropriate legal mechanisms to safeguard the transfer. Please see our Privacy Shield Notice below. For transfers to or from the United Kingdom, we make use of the standard contractual clauses.

### (ii) Privacy Shield Notice

Insight68, Inc. participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. Insight68 is committed to the Frameworks' applicable principles regarding transfers of Personal Data received from the European Economic Area (EEA), the United Kingdom, and Switzerland, in reliance on each Privacy Shield Framework. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List at <https://www.privacyshield.gov>.

Insight68 is responsible for the processing of personal data it receives under each Privacy Shield Framework and subsequently transfers to a third party acting as an agent on its behalf. Insight68 complies with the Privacy Shield Principles for all onward transfers of personal data from the EEA, the United Kingdom, and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Insight68 is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Insight68 may be required to disclose personal data in

response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

You may direct any inquiries or complaints related to our Privacy Shield compliance by sending us an email.

**Contact**

Data Protection Officer (DPO)

**[dpo@Insight68.com](mailto:dpo@Insight68.com)**