

## **ADAPTLY GO PRIVACY POLICY**

**Last Updated: June 25, 2018**

We at Adaptly, Inc. (“Adaptly,” “we,” “us,” or “our”) have created this privacy policy (this “Privacy Policy”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy relates to the information collection and use practices of Adaptly in connection with our proprietary analytical platform, [go.adaptly.com](http://go.adaptly.com) (“Platform”).

### **Description of Users and Acceptance of Terms**

This Privacy Policy applies to those who have signed up to access and use our Platform (“End Users”).

By signing up, accessing, and/or using our Platform, each End User agrees to the terms of this Privacy Policy. In the event of a conflict or inconsistency between this Privacy Policy and a Master Services Agreement and/or Terms of Use applicable to the End User, the following will control in order of precedence: (1) Master Services Agreement, (2) Terms of Use, and then (3) this Privacy Policy.

### **The Information We Collect and How We Use It**

In the course of operating the Platform, Adaptly collects (and/or receives) the following types of information.

#### **End User Information**

When you sign up as an End User, you will be asked to provide certain information which may include your e-mail address, and phone numbers (fax, cell, and/or landline). The information is used to provide Platform access authentication and to analyze your use of the Platform. We also use this information to further improve your user experience with respect to the Platform. It is not used for the purposes of direct marketing or email campaigns. A full list of the End User data that we collect is (collectively, “End User Information”): Email Addresses, Encrypted Passwords, Sign-In Count, Current Sign-In Timestamp, Last Sign-In Timestamp, Current Sign-In IP Address, and Last Sign-In IP Address.

Authy, a third party authentication service, may capture your mobile number for the purpose of authentication; however, we do not receive the phone number in either an encrypted or non-encrypted form.

#### **From Cookies**

With the exception of the “performance cookies” described below, we use cookies that are necessary for provision of our services. Cookies are small packets of data that a website stores on your computer’s hard drive or mobile device to “remember” information about your visit. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser’s documentation for information on how to do this. If you decide to block cookies from us, some features of the Platform may not function properly.

#### **Third-Party Analytics Providers (“Performance Cookies”)**

We use Heap, Mixpanel, FullStory, Segment, and Sumologic as third-party analytics services on the Platform to evaluate your use of the Platform, compile reports on activity (utilizing IP addresses, Internet service provider, browser type, operating system and language, referring and exit pages and URLs, date and time, city, country, region, time zone, advertising account attributes, media company, media company access token, amount of time spent on particular pages, display width, display height, email, and other application usage data), and analyze performance metrics (collectively, “Analytics Data”). These third parties use what we call “performance cookies” and other technologies to provide this Analytics Data so that we can further improve your user experience with respect to the Platform.

By accessing and using the Platform, you consent, to the extent permitted under applicable law, to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. In certain jurisdictions, due to local laws, you may receive a ‘cookie consent banner’ requesting your permission to enable the “performance cookies” used by these analytics providers.

For more information on these analytics services, including, where available, how to opt-out from certain Analytics Data collection, please visit the sites below (or, depending on jurisdiction, please re-visit your choices in the ‘cookie consent banner’). Please be advised that if you opt-out of any service, you may not be able to use the full functionality of the Platform.

For FullStory, please visit:      <https://www.fullstory.com>  
<https://www.fullstory.com/optout/>

For Mixpanel, please visit:      <https://mixpanel.com>  
<https://www.mixpanel.com/optout/>

For Heap, please visit:            <https://www.heapanalytics.com>

For Segment, please visit:      <https://segment.com>

For Sumologic, please visit:      [www.sumologic.com](http://www.sumologic.com)

### **Facebook Advertising Account**

When an End User authenticates their Platform account through their Facebook profile, Adaptly requests access to the following information: the End User’s Facebook profile information, all advertising accounts associated with the End User, and, depending on the role and/or permission, we may have the ability to read, create, or modify information about any advertiser client account. Adaptly will only obtain the information necessary to provide our services to the End User for specified advertiser clients. The End User may modify or remove Adaptly’s access to such information at any time through Facebook’s privacy tools.

### **Business Transfers**

In the event of a merger, dissolution, reorganization or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal information, would be transferred to the surviving entity in a merger or the acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy and

confidentiality of such personal information as set forth in this Privacy Policy. This policy shall be binding upon Adaptly and its legal successors in interest.

### **Disclosure to Public Authorities**

We are required to disclose personal information in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. We may also disclose personal information to other third parties when compelled to do so by government authorities or required by law or regulation including, but not limited to, in response to court orders and subpoenas.

### **Retention of Personal Information**

We will retain your personal information in a form that identifies you only for as long as it serves a legitimate business purpose, or unless a longer retention period is required or permitted by law.

### **How We Protect Your Information**

Adaptly takes very seriously the security and privacy of the personal information that it collects pursuant to this Privacy Policy. Accordingly, we will implement reasonable and appropriate security measures to protect your personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in processing and the nature of such data, and comply with applicable laws and regulations.

### **Children**

We do not knowingly collect personal information from children under the age of 13 through the Platform. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide personal information without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us at [contactus@adaptly.com](mailto:contactus@adaptly.com), and we will endeavor to delete that information from our databases.

### **Important Notice to All Non-US Residents**

Our servers are hosted by Amazon Web Services in the US. If you are located outside of the US, please be aware that any information provided to us, including personal information, will be transferred from your country of origin to the US. By using the Platform and by providing us information, you hereby consent to this transfer and our use of the information and data provided by you in accordance with this Privacy Policy.

### **Do Not Track**

Adaptly does not respond to "Do Not Track" settings or other related mechanisms at this time.

### **Links to External Websites**

The Platform may contain links to third-party websites ("External Sites"). Adaptly has no control over the privacy practices or the content of any such External Sites. As such, we are not

responsible for the content or the privacy policies of such External Sites. You should check the applicable privacy policy and terms of use when visiting any such External Sites.

### **Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time with or without notice to you. By accessing the Platform after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of information from or about End Users or as otherwise described above is governed by this Privacy Policy, in effect at the time we collect such information. Please refer back to this Privacy Policy on a regular basis.

### **How to Contact Us**

If you have questions about this Privacy Policy, please e-mail us at [contactus@adaptly.com](mailto:contactus@adaptly.com) with “Privacy Policy” in the subject line.