

## PRIVACY POLICY

**Effective Date: February 14, 2019**

Privacy is always a top priority for Us and We are firmly committed to guarding the confidence You have placed in Us and to use, responsibly and professionally, any information You provide. We won't ask You for personal information unless We feel it is necessary to provide Our Service. We won't share Your personal information with anyone except to comply with the law, develop our products and services, or protect our rights. And we will never rent or sell personal information to any third party.

This Privacy Policy applies to transactions and activities and data gathered through Our service and mobile app (collectively the "Service"). The purpose of this Privacy Policy is to notify You of what information of Yours is collected; how the information is used; with whom the information may be shared; what choices are available to You regarding collection, use and distribution of the Information; what kind of security procedures are in place to protect the loss, misuse or alteration of Information under Our control; and how You can correct any inaccuracies in the information.

We may choose to update this Privacy Policy at any time by providing an email notice to You. We encourage You to review this Privacy Policy periodically, as Your continued use of the Service will mean You accept those changes, whether You have read them or not.

Please note that this Privacy Policy is a legally binding agreement made between You ("You," "Your," or "Yourself") and Clutch Partners, LLC, ("Provider" "We," "Us" or "Our").

### **1. Your Information**

In order to operate the Service, and to provide You with information about products or services that may be of interest to You, We may collect (a) "personal information" (i.e. information that could be used to contact You directly, such as your name and email address); (b) "geo-locational data" (i.e. information that can be used to identify Your physical location); (c) "meta-data" (i.e. information which describes how, when and by whom a particular set of data was collected, and how the data is formatted; and (d) Log file information (i.e. information which is automatically reported by your browser each time you make a request to visit a web page such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, pages viewed, and other similar information. Collectively, this information is called "Your Information".

### **2. Information Transfer**

We do not sell or rent your Information to third parties without your consent. We view protection of privacy as a critical community principle. We understand clearly that your information and your trust is one of our most important assets. If we ever change how we use Your Information, we will notify you with an email notice. We store and process Your information on computers that are protected by physical as well as technological security devices.

We may share aggregate information about Our users that does not identify You personally, such as by publishing a report on trends in the usage of the Service and using other data analytics tools. Please note that, while the aggregate data We provide will not identify You personally, in some instances third parties may be able to "de-anonymize" aggregate data to identify You personally based on additional information they have about You or that they receive from third parties. While We do not intend for third parties to de-anonymize the aggregate data We provide, if You are concerned about potentially being personally identified, You should not use the Service.

In addition, as We continue to develop Our business, We might sell or buy subsidiaries, or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to applicable data protection laws and the terms in any privacy policy then current at the time the

transaction closes. Also, in the unlikely event that We, or substantially all of Our assets are acquired, customer information will of course be one of the transferred assets.

Any third party with whom we are allowed to share your personal information is authorized to use your personal information in accordance with our contractual arrangements with such third parties and in accordance with their own privacy policies, over which we have no control, and you agree that we are not responsible or liable for any of their actions or omissions. Those who contact you will need to be instructed directly by you regarding your preferences for the use of your personal information by them.

### **3. Material You Choose to Reveal**

You may post information, including personal information, on areas of the Service that may be viewed by other users, although We recommend that You do not do so. We urge You to use good judgment. Do not post any information, including without limitation, personal information, that You do not want other users to know. Many internet connections are public and/or not secure, and other users using that same connection may have access to Your information; please make sure that You are using a secure internet connection.

YOU ASSUME ALL RESPONSIBILITY FOR ANY LOSS OF PRIVACY OR OTHER HARM RESULTING FROM YOUR VOLUNTARY DISCLOSURE OF PERSONAL INFORMATION.

### **4. Device Identifiers**

In addition to the information gathered as described above, We may use device identifiers in Our Service. Device identifiers are small data files stored on your mobile device, which help Us identify your mobile device. A device identifier may deliver information to us or to a third party partner about how You browse and use the Service. This can help Us provide reports or personalized content and ads via the Service.

### **5. Third Parties' Use of Personal Identifiers and Device Identifiers**

The Service may include third-party advertising, links to other sites, and other content from third-party businesses. These third-party sites, businesses, and advertisers, or advertising companies working on their behalf, may use device Identifiers and personal identifiers to measure the effectiveness of their ads, personalize or optimize advertising content and to track users who link from their respective websites to the Service.

We do not have access to or control over such identifiers that these third parties may use. We are not responsible for the privacy practices or the content of these third-party sites. You are encouraged to review the privacy policies of the different sites You visit.

Some third-party advertising companies may provide a mechanism to opt-out of their technology. For more information about the opt-out process, You may visit the Network Advertising Initiative website, available at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

### **6. How We Use Information**

We may use Your information:

- To provide You with our Service.
- To respond to Your requests or provide You with further information about Our Service and new developments thereto.
- To give Our product developers information that may be useful for developing new features and products.
- To improve the content and navigability of the Service.
- To alert You to new features, products, events and special offers.
- To enforce Our Terms of Use.

- When forwarding Digital Millennium Copyright Act (“DMCA”) infringement notifications, take down notices and counter notices. By submitting a DMCA infringement notification, counter notice or other communication, You consent to have this communication forwarded to the person or entity that stored or transmitted the content addressed by Your communications. For notices other than DMCA infringement notifications and counter notices, You may request that we edit out Your name and contact information. However, DMCA infringement notifications and counter notices (including any personal information set forth in the notifications) will be forwarded as submitted to us without any deletions.
- In connection with promotions that You may choose to participate in. Any information You submit in connection with promotions will be subject to the terms of the promotion, not this Privacy Policy. You will be given the option to consent to the use of Your information at the time You sign up for the promotion. You will not be required to participate in any promotion.
- If required to do so by law, court order or other government or law enforcement authority or regulatory agency; or, if We believe in good faith that disclosing this information is necessary or advisable, including, for example, to protect the rights, property, or safety of Provider, You, users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

We may host discussions or other moderated forums for users who can help each other with technical and general questions. Topics for discussion may include technical support questions and problems, suggestions for improvement, or anything else that relates to the Service. Please remember that any information that is disclosed in this area becomes public information and You should exercise caution when deciding to disclose Your personal information.

## **7. Information Updates**

Our databases automatically update any personal information You edit in Your account, or that You request We edit. Information transmitted through boards, chats, polls or through any other means remains in Our databases. Keep this in mind if You decide to communicate personal information through any of these means.

## **8. Information Retention**

To preserve the integrity of Our databases, Our standard procedures call for Us to retain information submitted by users for an indefinite length of time. We understand Your submissions as consent to store all of Your information in one place for this indefinite length of time, if We so wish. If required by law, We will remove user information by erasing it from Our database. We will also respond to written user requests to remove account information.

## **9. Special Cases in Which We Share Personal Information**

We may disclose personal information when We determine that such disclosure is necessary to comply with applicable law, to cooperate with law enforcement officials or to protect the interests or safety of Our company or visitors to the Service. We also may disclose Your personal information to Our subsidiary, affiliated and parent companies (if any). Whenever personal information is disclosed under this paragraph, We may also disclose Your demographic information along with it. If there exist any subsidiary, affiliated or parent companies, and they receive Your personal information or demographic information from Us, they will comply with and be bound by the terms of this Privacy Policy with respect to their use and disclosure of such information.

## **10. Our Security Precautions**

Your profile is password-protected so that only You have access to Your account information. In order to maintain this protection, do not give Your password to anyone. Our staff will never proactively reach out to You and ask for any personal account information, including Your password. You should never share devices. This will help protect Your information entered on public terminals from disclosure to third parties.

Unfortunately, no data transmission can be guaranteed to be 100% secure. As a result, We cannot guarantee the security of any information You transmit, and You do so at Your own risk. If You have any further questions on this issue, please refer to Our Terms of Use. We expressly disclaim any liability that may arise should any other individuals obtain the information You submit.

#### **11. European Union Users**

Our business is located primarily in the United States. If You provide information to us, the information will be transferred out of the European Union (EU) to the United States. By providing personal information to us, You are consenting to its storage and use as described in the terms and conditions of this Privacy Policy.

#### **12. Changing our Privacy Policy for Previously Gathered Information**

If at any point We decide to use particular personal information in a manner materially different from that stated at the time it was collected, We will notify users by way of an email and Your continued use of the Service will constitute Your acceptance of the new use terms. We also encourage You to review this Privacy Policy periodically. By using the Service, You do hereby represent and warrant that You have read, understand and agree to all terms of this Privacy Policy.

#### **13. Contacting Us**

If You have any questions about this Privacy Policy, Our practices or Your dealings with Us, You may contact Us at: