

IntellectSpace Privacy Policy and Security Specification

At IntellectSpace, we are committed to protecting your privacy. You can be our customer without giving us any information about yourself. But sometimes we do need information to provide services that you request. This Privacy Policy (“Policy”) provides you with information concerning our practices and procedures as they relate specifically to 1) information we collect about our customer and 2) the customer’s proprietary data that we collect, integrate, analyze, deliver and destroy, and 3) information we collect about our Data Subjects in order to fulfill our services to our customers. If you have additional questions or would like further information on this topic, please feel free to write to us at privacy@intellectspace.com. By reviewing this Policy agreement and becoming IntellectSpace customer, you are accepting the practices described herein. We may update this Policy from time to time, so please check back with us periodically or during the renewal of your services.

General Customer Information

1. Collecting your Personal Information

IntellectSpace does not collect any personal information about you unless you choose to provide it to us voluntarily. We define “personal information” as information that personally identifies you or allows us to contact you. Such information might include your phone number, name or email address. Generally, this information is requested when requesting information about or purchasing IntellectSpace products and services. If there is information you do not want to share with us, please do not provide the information to us.

Once you’re a customer of IntellectSpace, we’ll provide you with your User ID and password so that only you can access your solution or services. Your account information is secure and is accessible by using a password that you select. Do not share your password with anyone.

2. Use of your Personal Information

If you do provide us with personal information, we will only use it for the purposes described at the time of collection. Specifically, we may use your personal information in the following ways: (1) to deliver your solution and services to you; (2) to update your solution and services; and (3) to alert you to product upgrades, updated information and other new services from IntellectSpace.

IntellectSpace will not sell, license, transmit or disclose your personal information outside of IntellectSpace or its affiliates without notice to you unless (1) you expressly authorize us to do so, (2) it is necessary to allow our service providers, representatives, or agents to provide services for or to us, (3) it is necessary to provide our products or services to you, (4) it is disclosed to entities that perform marketing services on our behalf or to other entities with whom we have joint marketing or other agreements, (5) it is necessary or we deem it appropriate in connection with a sale of all or substantially all of the assets or business of IntellectSpace, a sale of stock or equity interests of IntellectSpace, or the merger of IntellectSpace into another entity or any consolidation, share exchange, combination, reorganization, or like transaction in which IntellectSpace is not the survivor, (6) it is necessary to protect and defend the rights or property of IntellectSpace, (7) it is necessary to act in urgent circumstances to protect the personal safety of IntellectSpace customers, or (8) otherwise as we are required or permitted by law.

3. Promotional Emails

IntellectSpace may send you e-mails with promotional offers, special event information, sales notifications or other messages only if you opt-in to receiving such e-mails at www.IntellectSpace.com. If you would no longer like to receive such e-mails from us, please follow the "Unsubscribe" instructions at the end of each email or contact us at unsubscribe@intellectspace.com. Your e-mail address will be removed from our marketing list. Please allow us a reasonable period of time in order to satisfy your request, as some promotions may already be in process.

4. Email

IntellectSpace appreciates your questions and comments about our solution and services and welcome your email messages to mailboxes listed on our website or to your representative. We will share your messages with those within and outside our organization that may be able to address the issues contained in your message. We will keep a copy of your message until we have had an opportunity to address your concerns. We may archive your message for a certain period of time or discard it, but your email message will not be used for any other purpose.

5. Access to your Personal Information

IntellectSpace will provide you with the means to ensure that your personal information is correct and current. If you are a

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customer or user of our website, you may submit updated information at any time. Registered users can view and edit personal information they have already given us on our website. All users can subscribe or unsubscribe to IntellectSpace email newsletters and blogs.

We require you to enter your password for security purposes before you update your email address, user name, password, and/or your security question and answer. If you change your email address, we send an email to both your old and new email addresses.

6. Security of your Personal Information

IntellectSpace restricts access to personal information collected about you at our website to our employees, our affiliates' employees, those who are otherwise specified in this Policy, or others who need to know that information to provide services to you or in the course of conducting our business operations or activities. While no website can guarantee security, we maintain appropriate physical, electronic, and procedural safeguards to protect your personal information collected via the website. We protect our databases with various physical, technical and procedural measures and we restrict access to your information by unauthorized persons. We also advise all IntellectSpace employees about their responsibility to protect customer data and we provide them with appropriate guidelines for adhering to our company's business ethics standards and confidentiality policies. Inside IntellectSpace, data is stored in password-controlled servers with limited access. Please find more details in the technology and security specifications below.

7. Links to Other Websites

For your convenience, we may provide links to other websites and web pages that we do not control (such as LinkedIn). We cannot be responsible for the privacy practices of any websites or pages not under our control and we do not endorse any of these websites or pages, the services or products described or offered on such sites or pages, or any of the content contained on those sites or pages.

8. California Privacy Statement for California Residents

IntellectSpace collects publicly available personal information about individuals, and we sell this information to our customers. The California Consumer Privacy Act, taking effect in 2020, grants new rights to California consumers regarding their personal information:

- The right to know what personal information is collected, used, shared or sold, both as to the categories and specific pieces of personal information;
- The right to delete personal information held by businesses;
- The right to opt-out of sale of personal information. Consumers are able to direct a business that sells personal information to stop selling that information.
- The right to non-discrimination in terms of price or service when a consumer exercises a privacy right under CCPA.

To exercise any of these rights you can email your request to privacy@IntellectSpace.com with your full legal name, your email address, your telephone number, and your state of residence. To exercise the right to opt out of sale of your personal information, insert this statement in the subject line of your email: Do Not Sell My Personal Information.

Before we can comply with requests we must verify your identity. In order to do this, please provide the name of your employer and your job title in your email request.

Last Updated: Jan 01, 2020

Effective Date: September 2003

IntellectSpace Privacy Shield Privacy Notice

IntellectSpace complies with the Privacy Shield Framework regarding the collection, use, and retention of personal information from European Union member countries. IntellectSpace has certified that it adheres to the Privacy Shield Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Privacy Shield program, and to view IntellectSpace's certification, please visit www.privacyshield.gov.

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We at IntellectSpace respect your concerns about privacy and value the relationship we have with you. IntellectSpace and affiliates have certified that they abide by the Privacy Shield privacy principles, regarding the collection, storage, transfer, use and other processing of job applicant, consumer, customer, supplier and other Personal Data (as defined below) transferred from the European Union ("EU") to the United States.

For purposes of this Notice, "Personal Data" means information that (i) is transferred from the European Union ("EU") to the United States, (ii) is recorded in any form, (iii) is about, or relates to, an identified or identifiable job applicant, consumer, customer, supplier or other individual, and (iv) can be linked to that job applicant, consumer, customer supplier or other individual. This Notice outlines our general policy and practices for implementing the Privacy Shield privacy principles for Personal Data.

IntellectSpace's participation in the Privacy Shield is subject to investigation and enforcement by the Federal Trade Commission.

Under certain conditions detailed in the Privacy Shield, Data Subjects may be able to invoke binding arbitration before the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission.

In the event we transfer Personal Data covered by this Privacy Shield Policy to a third party acting as a controller, we will do so consistent with any notice provided to Data Subjects and any consent they have given, and only if the third party has given us contractual assurances that it will (i) process the Personal Data for limited and specified purposes consistent with any consent provided by the Data Subjects, (ii) provide at least the same level of protection as is required by the Privacy Shield Principles and notify us if it makes a determination that it cannot do so; and (iii) cease processing of the Personal Data or take other reasonable and appropriate steps to remediate if it makes such a determination. If IntellectSpace has knowledge that a third party acting as a controller is processing Personal Data covered by this Privacy Shield Policy in a way that is contrary to the Privacy Shield Principles, IntellectSpace will take reasonable steps to prevent or stop such processing. IntellectSpace remains liable under the Privacy Shield Principles if an agent processes personal data covered by this Privacy Shield Policy in a manner inconsistent with the Principles, except where IntellectSpace is not responsible for the event-giving rise to the damage.

In compliance with the Privacy Shield Principles, IntellectSpace commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries, suggestions or complaints regarding our Private Shield policy should first contact IntellectSpace via email at privacy@intellectspace.com, or in writing at IntellectSpace Corporation 133 Queen Anne Ave North Suite 100, Seattle WA 98109.

IntellectSpace Corp has further committed to refer unresolved Privacy Shield complaints to JAMS, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim> for more information or to file a complaint.

The services of JAMS are provided at no cost to you.

IntellectSpace and the GDPR

The **General Data Protection Regulation (GDPR)** (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union and is effective as of May 25, 2018. It addresses the export of personal data outside the EU.

Our policy is to respect all laws that apply to our business and this includes the GDPR. We also appreciate that our customers have requirements under the GDPR that are directly impacted by their use of IntellectSpace products and services. We are committed to helping our customers stay in compliance with the GDPR and their local requirements.

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IntellectSpace operates internationally and transfers Personal Identifiable Information (Personal Data) to the United States and other countries for the purposes described in this policy. We rely on multiple legal bases to lawfully transfer Personal Data around the world. These include your consent, the EU-US and Swiss-US Privacy Shield, and EC approved privacy and security protections explained in this Privacy Policy. We are committed to protecting the privacy and confidentiality of Personally Identifiable Information when it is transferred. If you reside in or are located within the European Economic Area (“EEA”) and such transfers occur, we take appropriate steps to provide the same level of protection for the processing carried out in any such countries as you would have within the EEA to the extent feasible under applicable law. We participate in and commit to adhering to the EU-U.S. Privacy Shield Framework when transferring data from the EEA to the United States.

Individuals who reside in or are located in the EEA can access further information about their rights under the GDPR at https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights/what-are-my-rights_en

Privacy Principles

IntellectSpace's practices regarding the collection, storage, transfer, use and other processing of Personal Data comply with the Privacy Shield and GDPR principles of notice, choice, onward transfer, access, security, data integrity, and enforcement and oversight.

1. Notice

We notify our job applicants, consumers, customers, suppliers and others located in the EU about the purposes for which we collect and use Personal Data, the types of third parties to which we disclose the information, the choices job applicants, consumers, customers, suppliers and others have for limiting the use and disclosure of their information, and how to contact us about our practices concerning Personal Data.

When we receive Personal Data from our subsidiaries, affiliates or other entities in the EU, we will use and disclose such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such Personal Data relates.

2. Purpose of Collection and Use of Personal Data

IntellectSpace collects certain Personal Data such as name, company, title, email address, and telephone number. We do not collect sensitive Personal Data of consumers, customers or suppliers, such as information about medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or other sensitive information as defined by the Privacy Shield framework.

We use Personal Data of consumers, customers, suppliers and others (i) to respond to your requests, (ii) to evaluate the quality of our products and services, (iii) to communicate with you about our products, services and related issues, (iv) to notify you of and administer offers, contests, sweepstakes and other promotions, and (v) for internal administrative and analytics purposes and to comply with our legal obligations, policies and procedures.

3. Choice

IntellectSpace shares Personal Data with its service providers. With respect to Personal Data we share with other third parties, we provide job applicants, consumers, customers, suppliers and others located in the EU with an opportunity to opt-out of such sharing or have their Personal Data deleted (sometimes called “the right to be forgotten”). Please email us via privacy@intellectspace.com if you would like to opt-out. We do not use Personal Data for purposes incompatible with the purposes for which the information was originally collected without notifying the relevant consumers, customers, suppliers and others of such uses and offering an opportunity to opt-out.

In addition, we may disclose Personal Data (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials based on an enforceable government request or as may be required under applicable law, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity.

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4. Onward Transfer of Personal Data

We may share Personal Data with service providers we have retained to perform services on our behalf. We require service providers to whom we disclose Personal Data and who are not subject to laws based on the GDPR to either (i) subscribe to the Privacy Shield principles or (ii) contractually agree to provide at least the same level of protection for Personal Data as is required by the relevant Privacy Shield and GDPR principles. If the third party does not comply with its privacy obligations, IntellectSpace will take commercially reasonable steps to prevent or stop the use or disclosure of Personal Data.

5. Access to Personal Data

IntellectSpace provides job applicants, consumers, customers, suppliers and others with reasonable access to the Personal Data maintained about them. We also provide a reasonable opportunity to correct, amend or delete that information where it is inaccurate. We may limit or deny access to Personal Data where providing such access is unreasonably burdensome or expensive under the circumstances, or as otherwise permitted by the Privacy Shield and GDPR principles. To obtain access to Personal Data, job applicants, consumers, customers, suppliers and others may contact IntellectSpace as specified in the "How to Contact Us" section of this Policy.

6. Security

IntellectSpace maintains reasonable administrative, technical and physical safeguards to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction.

7. Data Integrity

IntellectSpace takes reasonable steps to ensure that Personal Data collected by IntellectSpace is relevant for the purposes for which it is to be used and that the information is reliable for its intended use and is accurate, complete and current. We depend on our job applicants, consumers, customers, suppliers and others to update or correct their Personal Data whenever necessary.

8. Enforcement and Oversight

IntellectSpace has established procedures for periodically verifying implementation of and compliance with the Privacy Shield principles. We conduct an annual self-assessment of our practices with respect to Personal Data to verify that representations we make about our Personal Data privacy practices are true and that related privacy policies have been implemented as represented.

Job applicants, consumers, customers, suppliers and others residing in the EU may file a complaint with our Legal Department in connection with IntellectSpace's processing of their Personal Data under the Privacy Shield and GDPR principles. If the complaint cannot be resolved through our internal process, we will cooperate with JAMS under the JAMS International Mediation Rules. We will take steps to remedy any problems arising out of a failure to comply with the Privacy Shield and GDPR principles.

How to Contact Us

If you have any questions about this regarding our Privacy Shield Privacy Policy or our practices concerning Personal Data, please email us at privacy@intellectspace.com or write to us at IntellectSpace Corporation, 133 Queen Anne Avenue North, Suite 100, Seattle, WA 98109.

Amendment

The IntellectSpace Privacy Shield Privacy Notice may be amended from time to time in compliance with the requirements of the Privacy Shield principles. Appropriate notice will be given concerning such amendments.

This Privacy Policy was last updated and posted on Jan 01, 2020.