

Privacy Policy

<https://socialchorus.com/multi-tenant-privacy-policy/>

SOCIALCHORUS CUSTOMER AND WEBSITE PRIVACY POLICY

Last Updated: January 31, 2020

SocialChorus, Inc. and its affiliates (“SocialChorus”) provide a service that connects organizations with their employees. This Privacy Policy explains how SocialChorus collects, uses, and discloses information through its websites (“Site”) or through your other interactions with us. This Privacy Policy explains how SocialChorus collects, uses, and discloses information from visitors to our website as well as internal users. It does not cover our data practices with respect to end users of our Services or with respect to employers that use SocialChorus technology to collect information from or about their employees. The privacy policy applicable to such uses may be found at [Multi Tenant Privacy Policy](#). If you are an end user of a SocialChorus-branded property and want to learn about our privacy practices, please visit [Multi Tenant Privacy Policy](#). If you are an end user and want to learn about your employer’s data practices with respect to the information it collects using SocialChorus’ services, please visit the privacy policy provided by your employer.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to review our Privacy Policy whenever you access the Site or otherwise interact with us to stay informed about our information practices and the choices available to you.

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| Use of Information | <p>We use the information we collect to provide, maintain, and improve our Services, such as to deliver and customize our services, and communicate with potential customers about our services and other products or services that may be of interest.</p> <p>We may also use the information we collect to:</p> <ul style="list-style-type: none">• detect, investigate, and prevent fraudulent transactions and other illegal activities and protect the rights and property of SocialChorus and others;• determine what products you and others might be interested in order to craft solutions to business problems; and• track communication preferences, so that communications are aligned with your wishes, including requests to not be contacted; and• combine your information with other information that is available to us, including information from other sources. |
| Sharing of Information | <p>We may share information we collect as follows or as otherwise described in this Privacy Policy:</p> <ul style="list-style-type: none">• With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;• In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;• If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of SocialChorus or others; |

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| | <ul style="list-style-type: none"> • In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company; • Between and among SocialChorus and our current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and • With your consent or at your direction. We may also share aggregated or de-identified information, which cannot reasonably be used to identify you. |
| Advertising and Analytics Services Provided by Others | <p>We may allow others to provide analytics services and serve advertisements on our behalf across the internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used by SocialChorus and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices or https://www.youronlinechoices.eu/ if you reside in the EU.</p> |
| Security | <p>SocialChorus takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.</p> |
| Data Retention | <p>We store the information we collect about you for as long as is necessary for the purpose(s) for which we originally collected it. We may retain certain information for legitimate business purposes or as required by law.</p> |
| Transfer of Information to the U.S. and Other Countries | <p>SocialChorus is based in the United States and we process and store information in the U.S. As such, we and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process it e.g. by signing the standard contractual clauses stipulated by the EU Commission with the data recipients or by relying on the Privacy Shield Principles. If SocialChorus transfers personal data to official authorities outside the European Economic Area (“EEA”), United Kingdom (“UK”), or Switzerland, if required by law, express consent has been given or is based on the legitimate interest of Social Chorus or the party for data protection purposes, e.g. internal administrative purposes and no higher legitimate interest of the data subject.</p> |
| Residents of the EEA, UK, and Switzerland | <p>If you are a resident of the EEA, UK, or Switzerland, you have certain rights and protections under the law regarding the processing of your personal data.</p> <p>Legal Basis for Processing If you are a resident of the EEA, UK or Switzerland, when we process your personal data, we will only do so under the following circumstances:</p> |

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| | <ul style="list-style-type: none"> • We have a legitimate interest in processing your personal data, such as to send you communications about products or services that may interest you. <p>Data Subject Requests If you are a resident of the EEA, UK, or Switzerland, you have the right to access personal data we hold about you and to ask that your personal data be corrected, erased, or transferred. You may also contact us using the contact information below to exercise these rights. You may also have the right to object to, or request that we restrict, certain processing. If you have access to our services through a workplace program and would like to exercise any of these rights, you should contact your employer who uses our services.</p> <p>Questions or Complaints If you are a resident of the EEA, UK, or Switzerland and have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the data privacy authority where you reside. For contact details of your local Data Protection Authority, please see: https://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm or https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection—switzerland.html.</p> |
| <p>Compliance with Privacy Shield Frameworks</p> | <p>SocialChorus complies with the EU – U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. SocialChorus has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. When SocialChorus uses service providers to process personal information received in reliance on the Privacy Shield Principles, SocialChorus is responsible if that service provider processes personal data in violation of the Privacy Shield Principles (unless SocialChorus can prove that it is not responsible for the service provider’s action that violated the Privacy Shield Principles). If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Framework and its Principles, and to view SocialChorus’ certification, please visit https://www.privacyshield.gov/. Social Chorus is subject to the investigatory and enforcement powers of the United States Federal Trade Commission.</p> <p>Additionally, in compliance with the EU – U.S. Privacy Shield and the Swiss – U.S. Privacy Shield Frameworks, SocialChorus commits to resolve complaints about customer privacy and the collection or use of personal data. European Union and Swiss individuals with inquiries or complaints regarding this Privacy Policy should first contact SocialChorus at the contact details mentioned below.</p> <p>SocialChorus has further committed to refer unresolved privacy complaints under the EU – U.S. Privacy Shield and the Swiss – U.S. Privacy Shield Principles to JAMS, an independent alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint, or if the complaint is not satisfactorily addressed, please visit https://www.jamsadr.com/eu-us-privacy-shield for more information and to file a complaint.</p> |

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| | <p>If the complaint is not resolved by contacting SocialChorus or through the independent dispute resolution process, you may choose to invoke binding arbitration before the Privacy Shield Panel created by the U.S. Department of Commerce and the European Commission or may contact your local Data Protection Authority.</p> |
| <p>Your Choices</p> | <p>Account Information Individuals may have the right to limit the use and disclosure of their personal information as required by the Privacy Shield’s Principles, such as whether your personal information is disclosed to a third party or used for purposes materially different from the purpose for which the personal information was originally collected or subsequently authorized by you.</p> <p>If you wish to limit the use and disclosure of personal information in accordance with the Privacy Shield Principles, please contact us at: privacy@socialchorus.com If you are accessing our services, you must contact your employer to update, correct or delete the information your employer collects about you using our services. If you are unable to do so, please contact us at the address below.</p> <p>Cookies Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Services.</p> |
| <p>Your California Privacy Rights</p> | <p>Consumers residing in California have certain rights with respect to their personal information under the California Consumer Privacy Act or (“CCPA”) (California Civil Code Section 1798.100 et seq.) and the “Shine the Light” Law (California Civil Code Section 1798.83). If you are a California resident, this section applies to you.</p> <p>California Consumer Privacy Act <u><i>Additional Disclosures Related to the Collection, Use, Disclosure and Sale of Personal Information</i></u></p> <p>Collection and Use of Personal Information: In the preceding 12 months, we have collected the following categories of personal information: IP Address, Email Address, First Name, Last Name, Phone Number, Device Information, and Geo-Location Data. We collect personal information for the business and commercial purposes described in the “Use of Information” section above.</p> <p>Disclosure of Personal Information: We may share your personal information with third parties as described in the “Sharing of Information” section above. In the preceding 12 months, we have disclosed the following categories of personal information for business or commercial purposes: IP Address, Email Address, First Name, Last Name, Phone Number, Device Information, and Geo-Location Data.</p> <p>Sale of Personal Information: California law requires that we provide transparency about personal information we “sell,” which for the purposes of the CCPA, means scenarios in which personal information is shared with 6sense in exchange for valuable consideration. In the preceding 12 months, we have “sold” the following categories of personal information, depending on how the CCPA is interpreted: IP Address. California consumers above the age of 16 have the right</p> |

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| | <p>to opt out of these sales at any time. We do not knowingly sell personal information about consumers under the age of 16. Please visit our “Do Not Sell My Info” page to learn more about how we sell information and to make an opt-out request.</p> <p><u><i>Your Consumer Rights</i></u></p> <p>If you are a California resident, you have the right to (1) request more information about the categories and specific pieces of personal information we have collected, sold and disclosed for a business purpose in the last 12 months, (2) deletion of your personal information, and (3) opt out of the sale of your personal information, if applicable, and (4) be free from discrimination for exercising your rights under the CCPA. You may make these requests by calling (888) 674-1158 or emailing support@socialchorus.com. To opt out of sales, you can also visit our “Do Not Sell My Info” page. We will verify your request by emailing you to confirm the details necessary to suppress your information from processing. To designate an authorized agent to exercise these rights on your behalf, please call us at (888) 674-1158 or email us at support@socialchorus.com to verify your request.</p> <p><u><i>Shine the Light</i></u></p> <p>California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. If you are a California resident and would like to make such a request, please contact us by calling (888) 674-1158 or emailing support@socialchorus.com.</p> |
| <p>Contact Us</p> | <p>If you have any questions about this Privacy Policy, please contact us at: <i>In the U.S. and other locations outside of the EU:</i></p> <p>SocialChorus Inc. 123 Mission St, 25th Floor San Francisco, California 94105 Email address: privacy@socialchorus.com Phone: 844.975.2533</p> <p><i>In the EU:</i></p> <p>SocialChorus UK Limited New Penderel House, 4th Floor 283-288 High Holborn, London WC1V 7HP United Kingdom Email address: privacy@socialchorus.com</p> |