

Privacy Policy

Effective: March 5th, 2020

This Privacy Policy applies to all the products, services and websites offered by Crowdvote Ltd. and its subsidiaries and affiliates, except where otherwise noted. We refer to those products, services and websites collectively as the “Services” in this policy. Some Services have supplementary privacy statements that explain in more detail our specific privacy practices in relation to them.

IF YOU ARE A CUSTOMER OF CROWDVOICE AND YOUR USERS CREATE CONTENT (YOU ARE A “ASK CREATOR”). IF YOU PARTICIPATE IN AN ASK (YOU ARE AN “ADVOCATE”)

ASK Creators & Advocates

Crowdvote is used by **ASK Creators** (companies that purchase the Crowdvote Platform (the “Platform”) to create Content and conduct ASKs online) and **Advocates** (people who are invited by the ASK Creators to access the Platform, participate and answer the ASKs). The information Crowdvote receives from ASK Creators and Advocates and how we handle it differs, so we have split this Privacy Policy into two parts: Privacy Statement for ASK Creators; and Privacy Statement for Advocates. Please refer to the one that applies to you:

PRIVACY STATEMENT FOR ASK CREATORS

- **Your Content Data is owned by you.** Not only that, but Crowdvote treats your Content as if it was private (except if you have made the Content available via a public link). We define “Content” as the data that is uploaded by the ASK Creators into the Platform. We don’t sell it to anyone and we don’t use the Advocate responses you collect for purposes unrelated to you or our Services, except in a limited set of circumstances (e.g. if we are compelled by a subpoena, or if you’ve given us permission to do so).
- **We safeguard Advocates’ email addresses.** To make it easier for you to invite people to check out your Advocate Platform via email, you may upload lists of email addresses, in which case Crowdvote acts as a mere custodian of that data. We don’t sell these email addresses and we use them only as directed by you and in accordance with this Policy. The same goes for any email addresses collected from your ASKs.
- **We hold your data securely.** Read our Security Policy for more information.

Content Data is stored on servers located in the United States. Crowdvote will process your Content Data on your behalf and under your instructions (including the ones agreed to in this Privacy Policy)

1. What information does Crowdvote collect?

When you use Crowdvote, we collect information relating to you and your use of our Services from a variety of sources. These are listed below. The sections afterward describe what we do with this information.

Information we collect directly from you

- **Registration information.** You need an Crowdvote account before you can create Content on Crowdvote. When you register for an account, we collect your username, password and email address. In case registration is through SSO we collect email and name.
- **Billing information.** If you make a payment to Crowdvote, we require you to provide your billing details, such as a name, address, email address and, in some instances, financial

information corresponding to your selected method of payment. If you provide a billing address, we will regard that as the location of the account holder.

- **Account settings.** You can set various preferences and personal details on pages like your account settings page.
- **Address book information.** We allow you to import email addresses and related metadata, such as names and roles, into a contact list and associate email addresses with email invitation collectors so you can easily invite people to check out your Content via email. We don't use these email addresses for our own purposes or email them except at your direction.
- **Content Data.** We store your Content Data and ASK responses for you.
- **Other data you intentionally share.** We may collect your personal information or data if you submit it to us in other contexts. For example, if you provide us with a testimonial, or participate in an Crowdsvocate ASK.

We don't share or abuse your Advocates' email addresses. Crowdsvocate will not email your Advocates or any of your contacts without your knowledge; and we will not sell those email addresses to any third parties.

Information we collect about you indirectly or passively when you interact with us

- **Usage data.** We collect usage data about you whenever you interact with our Services. This may include which webpages / application pages you visit, what you click on, when you performed those actions, and so on. Our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our website or platform portals, operating system versions, and timestamps.
- **Device data.** We collect data from the device and application you use to access our Services, such as your IP address, operating system version, device type, and browser type. We may also infer your geographic location based on your IP address.
- **Referral data.** If you arrive at an Crowdsvocate website from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.
- **Information from third parties.** We may collect your personal information or data from third parties if you give permission to those third parties to share your information with us. For example, you have the option of registering and signing into Crowdsvocate with a third-party authentication provider – such as social sign in or SSO. If you do this, the authentication of your logon details is handled by that third-party authenticator.
- **Information from page tags.** We use third-party tracking Services that employ cookies and page tags to collect aggregated and anonymized data about visitors to our websites. This data includes usage and user statistics.

2. How do we use the information we collect?

We treat the Content you upload, your ASK questions and responses as information that is private to you (except if you have made your Content or ASK questions and responses available via a public link). We know that, in many cases, you want to keep your Content, ASK questions and responses, and stories (which we collectively refer to as "Content Data") private. Unless you decide to share your Content Data with other third parties, we do not use your Content Data other than as described in this Privacy Policy or unless we have your express consent. We do not sell your Content Data to third parties.

Generally, we use the information we collect from you in connection with providing our Services to you and, on your behalf, to your Advocates. For example, specific ways we use this information are listed below. (See the next section of this Privacy Policy to see who we share your information with.) This Privacy Policy is not intended to restrict our use of Content Data that you have chosen to make available to third parties.

a. To provide you with our Services.

- This includes providing you with customer support, which requires us to access your information to assist you (such as with content creation or technical troubleshooting).
- Certain features of our Services use the content of your ASK questions and responses and your account information in additional ways. For example, you may allow us to aggregate the responses you receive to certain ASKs with responses received from Advocates participating in other ASKs. We may then report non-identified statistics about the aggregated data sent to you and other ASK Creators.
- If you choose to link your Crowdsvote account to a third-party account (such as *Salesforce* or *Marketo* account), we may use the information you allow us to collect from those third parties to provide you and your advocates additional targeting, insights and personalized content.
- In order to provide you with useful options to use the Services together with other applications such as community forum or social media, we may give you the option to export information to, and collect information from, third party applications and websites, including platforms such as *Salesforce* and *Marketo* and social networking sites such as *twitter*. When exporting and collecting such information, you may be disclosing your information to the individuals or organizations responsible for operating and maintaining such third-party applications and sites, and your information may be accessible by others visiting or using those applications or sites. We do not own or operate the applications or websites that you connect with, and you should review the privacy policies and statements of such websites to ensure you are comfortable with the ways in which they use the information you share with them.

b. To manage our Services.

We internally use your information, including certain Content Data, for the following limited purposes:

- **To monitor, maintain, and improve our Services and features.** We internally perform statistical and other analysis on information we collect (including usage data, device data, referral data, question and response data and information from page tags) to analyse and

measure user behaviour and trends, to understand how people use our Services, and to monitor, troubleshoot and improve our Services, including to help us evaluate or devise new features. We may use your information for internal purposes designed to keep our Services secure and operational, such as for troubleshooting and testing purposes, and for service improvement, marketing, research and development purposes.

- **To enforce our Terms of Service.**
 - **To prevent potentially illegal activities.**
 - **To screen for and prevent undesirable or abusive activity.** For example, we have automated systems that screen content for phishing activities, spam, and fraud.
- c. **To create new Services, features or content.** We may use your Content Data and Content metadata (that is, data about the characteristics of a Content) for our internal purposes to create and provide new services, features or content. In relation to Content metadata, we may look at statistics like response rates, question and answer word counts, and the average number of questions in a Content and publish interesting observations about these for informational or marketing purposes. When we do this, neither individual ASK Creators nor Advocates will be identified or identifiable unless we have obtained their permission.
- d. **To facilitate account creation and the logon process.** If you choose to link your Crowdsvocate account to a third-party account (such as *Salesforce* or *Marketo*), we use the information you allowed us to collect from those third parties to facilitate the account creation and login process.
- e. **To contact you about your service or account.** We occasionally send you communications of a transactional nature (e.g. service-related announcements, billing-related matters, changes to our Services or policies). You can't opt out of these communications since they are required to provide our Services to you.
- f. **To contact you for marketing purposes.** We will only do this if you have consented to our contacting you for this purpose.
- g. **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the Content Data we hold to determine how to respond.

3. With whom do we share or disclose your information?

When might we disclose your Content Data to third parties? Only for a limited number of reasons. We share your information with our service providers who help us to provide our Services to you. We contractually bind these service providers to keep your information confidential and to use it only for the purpose of providing their Services. By using our Services, you authorize Crowdsvocate to sub-contract in this manner on your behalf. In rare circumstances, we may share information if required by law, or in a corporate restructuring or acquisition context.

We recognize that you have entrusted us with safeguarding the privacy of your information. Because that trust is very important to us, the only time we will disclose or share your personal information or Content Data with a third party is when we have done one of three things, in accordance with applicable law: (a) given you notice, such as in this Privacy Policy; (b) obtained your express consent, such as through an opt-in checkbox; or (c) de-identified or aggregated the information so that individuals or other entities cannot

reasonably be identified by it. Where required by law, we will obtain your express consent prior to disclosing or sharing any personal information.

We may disclose:

- **Your information to our service providers.** We use service providers who help us to provide you with our Services. These providers are [listed as our sub-processors](#). We give relevant persons working for some of these providers access to your information, but only to the extent necessary for them to perform their Services for us. We also implement reasonable contractual and technical protections to ensure the confidentiality of your personal information and data is maintained, used only for the provision of their Services to us, and handled in accordance with this Privacy Policy. Examples of service providers include hosting Services, and web traffic analytics tools.
- **Your account details to your billing contact.** If your details (as the account holder) are different to the billing contact listed for your account, we may disclose your identity and account details to the billing contact upon their request (we also will usually attempt to notify you of such requests). By using our Services and agreeing to this Privacy Policy, you consent to this disclosure.
- **Your personal email address to your organization.** If the email address under which you've registered your account belongs to you and is not controlled by an organization, we may disclose that email address to that organization in order to help it understand who is associated with that organization uses Crowdsvote, and to assist the organization with its enterprise accounts.
- **Aggregated or de-identified information to third parties to improve or promote our Services.** No individuals can reasonably be identified or linked to any part of the information we share with third parties to improve or promote our Services.
- **The presence of a cookie to advertise our Services.** We may utilize advertising networks and exchanges to display ads promoting our Services on other websites. Those ads may be targeted based on the presence of a cookie, but in doing so will not share any other personal information with the advertiser. Our advertising network partners may use cookies and page tags or web beacons to collect certain non-personal information about your activities on this and other websites to provide you with targeted advertising based upon your interests. If you do not wish to have this information used for the purpose of serving you such targeted ads, you may opt-out. You will continue to receive generic ads.
- **Your information if required or permitted by law.** We may disclose your information as required or permitted by law, or when we believe that disclosure is necessary to protect our rights, protect your safety or the safety of others, and/or to comply with a judicial proceeding, court order, subpoena, or other legal process served on us.
- **Your information if there's a change in business ownership or structure.** If ownership of all or substantially all of our business changes, or we undertake a corporate reorganization

(including a merger) or any other action or transfer between Crowdsvocate entities, you expressly consent to Crowdsvocate transferring your information to the new owner or successor entity so that we can continue providing our Services. If required, Crowdsvocate will notify the applicable data protection agency in each jurisdiction of such a transfer in accordance with the notification procedures under applicable data protection laws.

- **Information you expressly consent to be shared.** For example, we may expressly request your permission to provide your contact details to third parties for various purposes, including to allow those third parties to contact you for marketing purposes. (You may later revoke your permission, but if you wish to stop receiving communications from a third party to which we provided your information with your permission, you will need to contact that third party directly.)

4. What are your rights to your information?

You can:

- **Update your account details.** You can update your registration and other account information on your Settings. Information is updated immediately.
- **Access and correct your personal information.** As an account holder, you may access and correct certain personal information that Crowdsvocate holds about you by visiting your Setting page. Some account holders and other individuals have certain legal rights to obtain information of whether we hold personal information about them, to access personal information we hold about them, and to obtain its correction, update, amendment or deletion in appropriate circumstances. Requests to exercise these rights may be directed to our customer support team. These rights are subject to some exceptions, such as where giving you access would have an unreasonable impact on the privacy of other individuals. We will respond to your request to exercise these rights within a reasonable time and, where required by law or where we deem it otherwise appropriate and practicable to do so, we will honor your request.
- **Download/backup your Content Data.** We provide you with the ability to export, share and publish your Content Data in a variety of formats. This allows you to create your own backups or conduct offline data analysis.
- **Delete your Content Data.** Deleting Content Data in the ways described on this page will not permanently delete Content Data immediately. As long as you maintain an account with us, we may retain your deleted data for a limited time in case you delete something by accident and need to restore it (which you can request by contacting customer support). To the extent permitted by law and within reasonable time, we will permanently delete your data if you request to cancel your account. However, if your data was previously made available to the public through a public link, additional copies of your data may remain available on the Internet even after your account has been deleted.

- **Cancel your account.** To cancel and delete your account, please contact Customer Support. Deleting your account will cause all the Content Data in the account to be permanently deleted from our systems within a reasonable time period, as permitted by law, and will disable your access to any other Services that require a Crowdsvocate account. We will respond to any such request, and any appropriate request to access, correct, update or delete your personal information within the time period specified by law (if applicable) or without excessive delay. We will promptly fulfill requests to delete personal data unless the request is not technically feasible, or such data is required to be retained by law (in which case we will block access to such data, if required by law).

For how long do we retain your data? We generally retain your data for as long as you have an account with us, or to comply with our legal obligations, resolve disputes, or enforce our agreements. Data that is deleted from our servers may remain as residual copies on offsite backup media for up to approximately 12 months afterward.

5. Security, cookies and other important information

Changes to this Privacy Policy. We may modify this Privacy Policy at any time, but if we do so, we will notify you by publishing the changes on this website. If we determine the changes are material, we will provide you with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you. If, after being informed of these changes, you do not cancel your subscription and continue to use our Services beyond the advance-notice period, you will be considered as having expressly consented to the changes in our Privacy Policy. If you disagree with the terms of this Privacy Policy or any updated Privacy Policy, you may close your account at any time.

- a. **Security.** Details about Crowdsvocate's security practices are available in our Security Policy. We are committed to handling your personal information and data with integrity and care. However, regardless of the security protections and precautions we undertake, there is always a risk that your personal data may be viewed and used by unauthorized third parties as a result of collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact customer support.
- b. **Data locations.** Our servers are based in the United States, and BI elements are in Netherlands – as described in <https://crowdsvocate.com/sub-processors-2/>. Your personal information will be hosted and processed by us in the United States.
- c. **Cookies.** We and our partners use cookies and similar technologies on our websites. Cookies are small bits of data we store on the device you use to access our Services so we can recognize repeat users. Each cookie expires after a certain period of time, depending on what we use it for. We use cookies and similar technologies for several reasons:
 - **To make our site easier to use.** If you use the "Remember me" feature when you sign into your account, we may store your username in a cookie to make it quicker for you to sign in whenever you return to Crowdsvocate.
 - **For security reasons.** We use cookies to authenticate your identity, such as confirming whether you are currently logged into Crowdsvocate.

- **To provide you with personalized content.** We may store user preferences, such as your default language, in cookies to personalize the content you see. We also use cookies to ensure that Advocates receive relevant and personalized ASKs and can't retake certain Content that they have already completed.
- **To improve our Services.** We use cookies to measure your usage of our websites and track referral data, as well as to occasionally display different versions of content to you. This information helps us to develop and improve our Services and optimize content display.
- **To advertise to you.** We, or our service providers and other third parties we work with, may place cookies when you visit our website and other websites or when you open emails that we send you, in order to provide you with more tailored marketing content (about our Services or other services), and to evaluate whether this content is useful or effective.

You can still choose to remove or disable cookies via your browser. Refer to your web browser's configuration documentation to learn how to do this. Please note that doing this may adversely impact your ability to use our Services. Enabling cookies ensures a smoother experience when using our websites. By using our websites and agreeing to this Privacy Policy, you expressly consent to the use of cookies as described in this policy.

- d. **Right to be Forgotten.** We are committed to taking reasonable steps to ensure that any personal information requests to be forgotten can be erased in a reasonable time of the request. However, this doesn't apply to information that you have made public by posting on our forums, blogs, or have made available to third parties yourself since once made public, it falls beyond the reach of what we can erase. We will do everything possible to erase any personal information you may have given us for marketing purposes if you withdraw your consent (opt out) from receiving information for us and request the right to be forgotten.
- e. **Blogs and Forums.** Our website may offer publicly accessible blogs and community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. We're not responsible for any personal information you choose to submit in these areas of our site. To request removal of your personal information from our blog or community forum, contact customer support.
- f. **Safety of Children and COPPA.** Our Services are not intended for and may not permissibly be used by individuals under the age of 13. Crowdsvocate does not knowingly collect personal data from persons under 13 or allow them to register. If it comes to our attention that we have collected personal data from such a person, we may delete this information without notice. If you have reason to believe that this has occurred, please contact customer support.

6. Additional information for European Union users

Crowdsvocate provides some of its Services to users in the EU.

"Personal data". For users located in the EU, references to "personal information" in this policy are equivalent to what is commonly referred to as "personal data" in the EU.

- a. **About IP addresses.** Our servers record the incoming IP addresses of visitors to our websites (whether or not the visitor has an Crowdvocate account) and store the IP addresses in log files. We use these log files for purposes such as system administration and maintenance, record keeping, tracking referring web sites, inferring your location, and security purposes (e.g. controlling abuse, spam and DDOS attacks). We also store IP addresses along with certain actions you take on our system. IP addresses are only linked to Content responses if a ASK Creator has configured a Content to collect IP addresses. By agreeing to this Privacy Policy, you expressly consent to Crowdvocate using your IP address for the foregoing purposes. If you wish to opt-out from the foregoing consent to use your IP address, you must cancel your account (if you have one) or not respond to a Content if requested to do so.
- b. **Data controller.** Crowdvocate is the data controller for registration, billing and other account information that we collect from ASK Creators and users in the EU. However, the data controller for Content Data is the ASK Creator. The ASK Creator determines how their Content questions and responses are used and disclosed. Crowdvocate only processes such Content Data in accordance with the instructions and permissions (including those given under this Privacy Policy) selected by the ASK Creator when they create and administer their Content.
- c. **Accessing and correcting your personal data.** You have the right to access and correct the personal information that Crowdvocate holds about you. This right may be exercised by visiting your account's page or by contacting customer support.
- d. **Right to be Forgotten.** We are committed to taking reasonable steps to ensure that any personal information requests to be forgotten can be erased in a reasonable time of the request. However, this doesn't apply to information that you have made public by posting on our forums, blogs, or have made available to third parties yourself since once made public, it falls beyond the reach of what we can erase. We will do everything possible to erase any personal information you may have given us for marketing purposes if you withdraw your consent (opt-out) from receiving information for us and request the right to be forgotten.
- e. **Data Export Request.** Under GDPR you have the right to receive an exported file of the personal data we hold about you, including any data you have provided us. You can also request that this data be changed, updated or removed. This does not include any data we are obliged to keep for administration, legal or security purposes.
- f. **Your responsibilities.** By using our Services, you agree to comply with applicable data protection requirements when collecting and using your Content Data, such as requirements to inform Advocates about the specific uses and disclosures of their data.

Consents. By clicking “I Agree” or any other button indicating your acceptance of this Privacy Policy, you expressly consent to the following:

- You consent to the collection, use, disclosure, and processing of your personal data in the manner described in this Privacy Policy, including our procedures relating to cookies, IP addresses and logs.
- Our servers are based in the United States, so your personal data will be primarily processed by us in the United States. You consent to the transfer and processing of your personal data in the United States by Crowdsvocate Ltd. and in the data locations of our service providers.
- You consent and agree that we may transfer your data to data processors located in the United States. Your consent is voluntary, and you may revoke your consent by opting out at any time. Please note that if you opt-out, we may no longer be able to provide you our Services.
- You consent to us sharing your personal data with relevant persons working for service providers who assist us to provide our Services.
- If you have enabled cookies on your web browser, you consent to our use of cookies as described in this Privacy Policy.

7. California Residents

The California Consumer Privacy Act requires businesses to disclose whether they sell Personal Data. As a “service provider” covered by the CCPA, we do not sell Personal Data. We may share Personal Data with third parties or allow them to collect Personal Data from our sites or Services if those third parties are authorized service providers or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such Personal Data, or if you use Crowdsvocate’s SaaS products (Platform) or services to interact with third parties (Advocates) or direct us to disclose your Personal Data to third parties.

California law requires that we detail the categories of Personal Data that we share or disclose for certain “business purposes,” such as disclosures to service providers that assist us with securing our services or marketing our products. We disclose the following categories of Personal Data for our business purposes:

- Identifiers;
- Commercial information;
- Internet activity information;
- Financial information;
- Professional and employment-related information;
- Education information; and
- Inferences drawn from any of the above information categories.

California law grants state residents certain rights, including the rights to access specific types of Personal Data, to learn how we process Personal Data, to request deletion of Personal Data, and not to be discriminated against or denied goods or services for exercising these rights.

If you are a California resident under the age of 18 and have registered for an account with us, you may ask us to remove content or information that you have posted to our website(s). Please note that your request does not ensure complete or comprehensive removal of the content or information, because, for example, some of your content may have been reposted by another user.

If you are an ASK Creator or visitor wishing to exercise your rights as a resident of California, please contact us at privacy@crowdsvocate.com.

We may need to verify your identity and place of residence before completing your rights request.

PRIVACY STATEMENT FOR ADVOCATES

- **Content is administered by ASK Creators.** ASK Creators upload Content in their Platforms, create and conduct tens of thousands of acts of advocacy, including but not limited to ASKs, surveys, referrals, testimonials, stories, and other contests each day using our Services (collectively, “ASKs” or the “Content”). We host the Content on our websites and collect the responses that you, as an Advocate, submit to the ASK Creators. If you have any questions about a ASK you are taking or any Content that is uploaded in a Platform you are visiting, please contact the ASK Creator directly as Crowdsvocate is not responsible for the content in the Platform, the ASKs or your responses to it. The ASK Creator is usually the same person that invited you to visit their Platform hosted in the Crowdsvocate platform and take the ASK. Sometimes, ASK Creators have their own Privacy Policy pertaining their Platforms.
- **We don't sell your responses to third parties.** Crowdsvocate doesn't sell or share your ASK responses with third party advertisers or marketers. Crowdsvocate merely acts as a custodian on behalf of the ASK Creator who controls your data, except for public Content as described in this Privacy Policy.
- If you think an ASK or any content in a specific Platform violates our Terms of Service or may be engaging in illegal activity, please contact us via email at privacy@crowdsvocate.com.

1. What information does Crowdsvocate collect?

When you respond to a ASK hosted by Crowdsvocate, we collect, on behalf and upon instructions (including the ones provided in this Privacy Policy) of ASK Creators, information relating to you and your use of our Services from a variety of sources. These are listed below. The sections afterward describe what we do with this information.

Information we collect directly from you

ASK responses. We collect and store the ASK responses that you submit. The ASK Creator is responsible for this data and manages it. An ASK may ask you to provide personal information or data. If you have any questions about an ASK you are taking, please contact the ASK Creator directly as Crowdsvocate is not responsible for the content of that Content. The ASK Creator is usually the same person that invited you to participate in the Platform and take the ASK and sometimes they have their own Privacy Policy.

Are your Content responses anonymous?

Not if you are a registered advocate.

Information we collect about you from other sources

- a. **Registration information.** When you register as an Advocate to visit a Platform, we collect your username and password.
- b. **Usage data.** We collect usage data about you in ASK Creator web-assets and whenever you interact with our Services. This may include which webpages you visit, what you click on, when you performed those actions, and so on. Additionally, as with most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, the pages you viewed, operating system versions, and timestamps. Note that we do not link this usage data to your ASK responses.

- c. **Device data.** We collect data from the device and application you use to access our Services, such as your IP address, operating system version, device type, and browser type. We may also infer your geographic location based on your IP address. Your IP address will be linked to your Content responses unless an ASK Creator has disabled IP address collection for the Content you respond to.
- d. **Referral data.** We record information about the source that referred you to a Content (e.g. a link on a website or in an email).
- e. **Information from page tags.** We use third party tracking Services that employ cookies and page tags to collect aggregated and anonymized data about visitors to our websites. This data includes usage and user statistics.
- f. **Your email address.** When an ASK Creator uses email invitation or when you sign-up to relevant ASK Creator program, we collect your email address when the ASK Creator provides it to us. We don't use this to send you email except at the direction of an ASK Creator. The emails we send on behalf of an ASK Creator appear to come from that ASK Creator's email address. If you no longer want to be contacted by an ASK Creator, please contact the ASK Creator directly.

Providing Content responses is voluntary. Remember, you can always choose not to provide an answer to any given ASK. However, sometimes this will prevent you from completing an ASK if the ASK Creator has marked that question as requiring an answer.

2. How does Crowdsvote use the information we collect?

Your responses are owned and managed by the ASK Creator, and we treat that information as private to the ASK Creator, except if the ASK Creator has made the questions and responses available via a public link. Please contact the ASK Creator directly to understand how they will use your responses. Some ASK Creators may provide you with a Privacy Policy or notice at the time you access their Platform and we encourage you to review that to understand how the ASK Creator will handle your responses. Please see the ASK Creator version of this Privacy Policy to understand how Crowdsvote handles Content responses. Crowdsvote does not sell Content responses to third parties without the ASK Creator's permission and we do not use any contact details collected from our customers to contact Advocates. We also use the information we collect from you (including usage data, device data, referral data and information from page tags) to manage and improve our Services, for research purposes, and for the various purposes described in the ASK Creator version of this Privacy Policy.

3. With whom do we share or disclose your information?

Crowdsvote does not sell your responses! We will share your ASK responses with third parties only as described in this Privacy Policy.

We only disclose **your responses to the ASK Creators**. We host Content for ASK Creators, but they are really the primary curator of Content Data. Anything you expressly disclose in your responses will, naturally, be provided to them. Please contact the ASK Creator directly to understand how they might share your Content responses. Please see the ASK Creator version of this Privacy Policy to understand what Crowdsvote tells ASK Creators about how we handle Content responses, and to whom Crowdsvote may disclose Content responses.

4. What are your rights to your information?

1. **Contact the ASK Creator to access and correct your responses and personal information.** Because we collect responses on behalf of ASK Creators, you will need to contact the ASK Creator if you have any questions about the Content, or if you want to access, update, or delete anything in your responses. We provide ASK Creators with tools to maintain the responses they collect through their ASKs. You may request access to and correction of the personal information we hold about you by contacting customer support, but in most cases Crowdsvocate cannot provide you with this access since responses are the ASK Creator's private information (except if the ASK Creator has made the questions and responses available via a public link) and giving you access may have an unreasonable impact on the privacy of other individuals. We will respond to your request for access or correction within a reasonable time and, where reasonable and practicable to do so, we will provide access to your personal information in the manner requested by you.
2. **Opt out of receiving Content.** You may opt out of receiving email invitations to take ASKs which are sent by ASK Creators via Crowdsvocate.

5. Security, cookies and other important information

Changes to this Privacy Policy. We may modify this Privacy Policy at any time, but if we do so, we will notify you by publishing the changes on this website. If we determine the changes are material, we will provide you with additional, prominent notice as is appropriate under the circumstances, such as via email or in another conspicuous manner reasonably designed to notify you. If, after being informed of the changes, you continue to use our Services beyond the advance-notice period, you will be considered as having expressly consented to the changes in our Privacy Policy. If you disagree with the terms of this Privacy Policy or any updated Privacy Policy, you may close your account (if you have one) at any time or not respond to an ASK.

- a. **Security.** Details about Crowdsvocate's security practices are available in our Security Statement. We are committed to handling your personal information and data with integrity and care. However, regardless of the security protections and precautions we undertake, there is always a risk that your personal data may be viewed and used by unauthorized third parties as a result of collecting and transmitting your data through the Internet. If you have any questions about the security of your personal information, contact customer support.
- b. **Data locations.** Our servers are based in the United States, so your personal information will be hosted and processed by us in the United States.
- c. **Cookies.** We and our partners use cookies and similar technologies on our websites. Cookies are small bits of data we store on the device you use to access our Services so we can recognize repeat users. Each cookie expires after a certain period of time, depending on what we use it for. We use cookies and similar technologies for several reasons:
 - **To make our site easier to use.** If you use the "Remember me" feature when you sign into your account, we may store your username in a cookie to make it quicker for you to sign in whenever you return to Crowdsvocate.

- **For security reasons.** We use cookies to authenticate your identity, such as confirming whether you are currently logged into Crowdsvocate.
- **To provide you with personalized content.** We may store user preferences, such as your default language, in cookies to personalize the content you see. We also use cookies to ensure that users can't retake certain ASKs that they have already completed.
- **To improve our Services.** We use cookies to measure your usage of our websites and track referral data, as well as to occasionally display different versions of content to you. This information helps us to develop and improve our Services and optimize the content we display to users.

We don't believe cookies are sinister, but you can still choose to remove or disable cookies via your browser. Refer to your web browser's configuration documentation to learn how to do this. Please note that doing this may adversely impact your ability to use our Services. Enabling cookies ensures a smoother experience when using our websites. By using our websites and agreeing to this Privacy Policy, you expressly consent to the use of cookies as described in this policy.

- d. **Blogs and Forums.** Our websites may offer publicly accessible blogs and community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. We're not responsible for any personal information you choose to submit in these areas of our site. To request removal of your personal information from our blog or community forum, contact customer support. In some cases, we may not be able to fulfill your request and we will let you know why. Commenting systems on our blogs are managed by a third-party application that may require you to register to post a comment. Please review that application's Privacy Policy to learn how the third party uses your information.
- e. **Online Tracking.** We currently do not process or comply with any web browser's "do not track" signal or other similar mechanism that indicates a request to disable online tracking of individual users who visit our websites or use our Services (unless otherwise stated in a service-specific privacy statement).
- f. **Social Media Features.** Our websites may include social media features or widgets, such as the *Facebook Like* button. Use of these features may allow them to collect your IP address, detect which page you are visiting on our site, and set a cookie to enable the feature to function properly. Your interactions with these features are governed by the Privacy Policy of the third party providing it.
- g. **Safety of Minors and COPPA.** Our Services are not intended for and may not be used by minors. "Minors" are individuals under the age of majority in their place of residence (or under 13 in the United States). Crowdsvocate does not knowingly collect personal data from minors or allow them to register. If it comes to our attention that we have collected personal data from a minor, we may delete this information without notice. If you have reason to believe that this has occurred, please contact customer support.

6. Additional information for European Union users

Crowdvocate provides some of its Services to users in the EU.

- a. **“Personal data”.** For users located in the EU, references to “personal information” in this policy are equivalent to what is commonly referred to as “personal data” in the EU.
- b. **About IP addresses.** Our servers record the incoming IP addresses of visitors to our websites (whether or not the visitor has an Crowdvocate account) and store the IP addresses in log files. We use these log files for purposes such as system administration and maintenance, record keeping, tracking referring web sites, inferring your location, and security purposes (e.g. controlling abuse, spam and DDOS attacks). We also store IP addresses along with certain actions you take on our system. IP addresses are only linked to Content responses if an ASK Creator has configured a Content to collect IP addresses. By agreeing to this Privacy Policy, you expressly consent to Crowdvocate using your IP address for the foregoing purposes. If you wish to opt out from the foregoing consent to use your IP address, you must cancel your account (if you have one) or not respond to a Content if requested to do so.
- c. **Data controller.** Crowdvocate is the data controller for registration, billing and other account information that we collect from users in the EU. However, the data controller for Content Data is the ASK Creator. The ASK Creator determines how their Content questions and responses are used and disclosed. Crowdvocate only processes such Content Data in accordance with the instructions and permissions (including those given under this Privacy Policy) selected by the ASK Creator when they create and administer their Content.
- d. **Accessing and correcting your personal data.** You have the right to access and correct the personal information that Crowdvocate holds about you. This right may be exercised by contacting customer support.
- e. **Right to be Forgotten.** We are committed to taking reasonable steps to ensure that any personal information requests to be forgotten can be erased in a reasonable time of the request. However, this doesn't apply to information that you have made public by posting on our forums, blogs, or have made available to third parties yourself since once made public, it falls beyond the reach of what we can erase. We will do everything possible to erase any personal information you may have given us for marketing purposes if you withdraw your consent (opt out) from receiving information for us and request the right to be forgotten.
- f. **Data Export Request.** Under GDPR you have the right to receive an exported file of the personal data we hold about you, including any data you have provided us. You can also request that this data be changed, updated or removed. This does not include any data we are obliged to keep for administration, legal or security purposes.

Consents. By clicking “I Agree” or any other button indicating your acceptance of this Privacy Policy, you expressly consent to the following:

- You consent to the collection, use, disclosure and processing of your personal data in the manner described in this Privacy Policy, including our procedures relating to **cookies, IP addresses and logs**.
- Our servers are based in the United States, so your personal data will be primarily processed by us in the United States. You consent to the transfer and processing of your personal data in the United States by Crowdsvocate Ltd. and our various affiliates and service providers.
- You consent and agree that we may transfer your data to data processors located in the United States. Your consent is voluntary, and you may revoke your consent by opting out at any time. Please note that if you opt-out, we may no longer be able to provide you our Services.
- You consent to us sharing your personal data with relevant persons working for service providers who assist us to provide our Services.
- If you have enabled cookies on your web browser, you consent to our use of cookies as described in this Privacy Policy.

7. California Residents

The California Consumer Privacy Act requires businesses to disclose whether they sell Personal Data. As a “service provider” covered by the CCPA, we do not sell Personal Data. We may share Personal Data with third parties or allow them to collect Personal Data from our sites or Services if those third parties are authorized service providers or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such Personal Data, or if you use Crowdsvocate’s SaaS products (i.e. AdvocatePlatform) or services to interact with third parties (Advocates) or direct us to disclose your Personal Data to third parties.

California law requires that we detail the categories of Personal Data that we share or disclose for certain “business purposes,” such as disclosures to service providers that assist us with securing our services or marketing our products. We disclose the following categories of Personal Data for our business purposes:

- Identifiers;
- Commercial information;
- Internet activity information;
- Financial information;
- Professional and employment-related information;
- Education information; and
- Inferences drawn from any of the above information categories.

California law grants state residents certain rights, including the rights to access specific types of Personal Data, to learn how we process Personal Data, to request deletion of Personal Data, and not to be discriminated against or denied goods or services for exercising these rights.

If you are a California resident under the age of 18 and have registered for an account with us, you may Ask us to remove content or information that you have posted to our website(s). Please note that your request does not ensure complete or comprehensive removal of the content or information, because, for example, some of your content may have been reposted by another user.

If you are an Advocate or visitor wishing to exercise your rights as a resident of California, please contact us at privacy@crowdsvocate.com.

We may need to verify your identity and place of residence before completing your rights request.

Questions and Requests

We are committed to responding to reasonable requests to review any of your personal information or content we may have and to amend, correct, or delete any inaccuracies. To have your information amended, corrected, or deleted, or if you have any questions that weren't answered in this Data Privacy Policy, you can contact us at Crowdvocate, 16 Hamishna Street, Adanim, Israel or email us at privacy@crowdvocate.com.