



CROSSLEAD PRIVACY POLICY
VERSION 1.1
LAST UPDATED: JULY 15, 2016

CrossLead, Inc. (the “**Company**”) is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the Personal Data (as defined below) we collect from users of our website, located at <http://www.crosslead.com/> (the “**Site**”).

1. **Questions; Contacting Company; Reporting Violations.** If you have any questions, concerns, or complaints regarding our Privacy Policy, data collection, or processing practices, or if you wish to report any security violations to us, please contact us at the following address or email:

CrossLead, Inc.
1445 New York Ave NW, First Floor
Washington, DC 20005
support@crosslead.com

2. **User Consent.** By submitting Personal Data through our Site, you agree to the terms of this Privacy Policy and you expressly consent to the collection, use, and disclosure of your Personal Data in accordance with this Privacy Policy.

A Note About Children. We do not intentionally gather Personal Data from visitors who are under the age of 13. If a child under 13 submits Personal Data to the Company and we learn that the Personal Data is the information of a child under 13, we will attempt to delete the information as soon as possible. If you believe that we might have any Personal Data from a child under 13, please contact us at support@crosslead.com.

3. **A Note to Users Outside of the United States. If you are a non-U.S. user of the Site, by visiting the Site and providing us with data, you acknowledge and agree that your Personal Data may be processed for the purposes identified in this Privacy Policy. In addition, your Personal Data may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of Personal Data may be less stringent than the laws in your country. By providing your data, you consent to such processing.**

4. **Types of Data We Collect.** “**Personal Data**” means data that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, and any other non-public information about you that is associated with or linked to any of the foregoing data. “**Anonymous Data**” means data that is not associated with or linked to your Personal Data. Anonymous Data on its own does not allow for the identification of individual persons. We collect Personal Data and Anonymous Data, as described below.

- **Information You Provide to Us.**

- We may collect Personal Data from you, such as your first and last name, gender, e-mail and mailing addresses, professional title, company name, and password when you create an account to log in to our network (“**Account**”).
- If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.
- When you post content (text, images, photographs, messages, comments or any other kind of content that is not your e-mail address) on our Site, the information contained in your posting will be stored in our servers and other users may be able to see it.

- When you post messages on a message board on our Site, the information contained in your posting will be stored on our servers and other users may be able to see it.
- When you participate in one of our surveys, we may collect additional profile information.
- We also collect other types of Personal Data that you provide to us voluntarily, such as your operating system and version, product registration number, and other requested information if you contact us via e-mail regarding support for our products or services.
- When you order products or services through our Site, we will collect all information necessary to complete the transaction, including your name, credit card information, billing information, and shipping information. When you submit credit card numbers, this information will be encrypted using industry standard technology.
- We may also collect Personal Data at other points in our Site where it is stated that Personal Data is being collected.
- **Information Collected via Technology.**
 - Information Collected by Our Servers. To make our Site more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol (“IP”) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.
 - Log Files. As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Site, track users’ movements around the Site, gather demographic information about our user base as a whole, and better tailor the services on our Site to our users’ needs. For example, some of the information may be collected so that when you visit the Site again, it will recognize you and the information could then be used to serve advertisements and other information appropriate to your interests. Except as noted in this Privacy Policy, we do not link this automatically-collected data to Personal Data.
 - Cookies. Like many online services, we use cookies to collect information. “**Cookies**” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. This type of information is collected to make the Site more useful to you and to tailor the experience with us to meet your interests and needs.
 - Pixel Tag. In addition, we use “**Pixel Tags**” (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to Cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user’s computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user. We do not tie the information gathered by Pixel Tags to our users’ Personal Data.
 - How We Respond to Do Not Track Signals. We do not currently respond to “do not track” signals or other mechanisms that might enable consumers to opt out of tracking on our Site.
 - Flash LSOs. When we post videos, third parties may use local shared objects, known as “**Flash Cookies**,” to store your preferences for volume control or to personalize certain video

features. Flash Cookies differ from browser Cookies in the amount and type of data collected and how the data is stored. Cookie management tools provided by your browser will not remove Flash Cookies. To learn how to manage privacy and storage settings for Flash Cookies, please click here:

http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html.

- Google Analytics. We use Google Analytics to help analyze how users use the Site. Google Analytics uses Cookies to collect information such as how often users visit the Site, what pages they visit, and what other sites they used prior to coming to the Site. We use the information we receive from Google Analytics only to improve our Site and any services provided on the Site. Google Analytics collects only the IP address assigned to you on the date you visit the Site, rather than your name or other personally identifying information. We do not combine the information generated through the use of Google Analytics with your Personal Data. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Site, the Cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

5. Use of Your Personal Data

- **General Use.** In general, Personal Data you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your Personal Data in the following ways:
 - facilitate the creation of and secure your Account on our network;
 - identify you as a user in our system;
 - provide improved administration of our Site;
 - improve the quality of experience when you interact with our Site;
 - send you a welcome e-mail to verify ownership of the e-mail address provided when your Account was created;
 - send you administrative e-mail notifications, such as security or support and maintenance advisories;
 - respond to your inquiries related to employment opportunities or other requests;
 - make telephone calls to you, from time to time, as a part of secondary fraud protection or to solicit your feedback; and
 - send newsletters, surveys, offers, and other promotional materials related to our products and services and for other marketing purposes of the Company.
- **User Testimonials and Feedback.** We often receive testimonials and comments from users who have had positive experiences with our products and services. We occasionally publish such content. When we publish this content, we may identify our users by their first name and last initial, and may also indicate their home cities. We will not publish full first and last names with feedback unless the user gives consent for his or her full name to be posted. If you make any comments on a blog or forum associated with our Site, you should be aware that any Personal Data you submit there can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in these blogs and forums.
- **Creation of Anonymous Data.** We may create Anonymous Data records from Personal Data by excluding information (such as your name) that makes the data personally identifiable. We use this Anonymous Data to analyze request and usage patterns so that we may enhance the content of our services and improve Site navigation. We reserve the right to use Anonymous Data for any purpose and disclose Anonymous Data to third parties in our sole discretion.



6. **Disclosure of Your Personal Data.** We disclose your Personal Data as described below, and as described elsewhere in this Privacy Policy.
- **Third Party Service Providers.** We may share your Personal Data with third party service providers to: provide you with the services we offer through our Site; conduct quality assurance testing; facilitate creation of Accounts; provide technical support; and/or provide other services. These third party service providers are not permitted to use your Personal Data other than to provide the services requested by the Company.
 - **Affiliates.** We may share some or all of your Personal Data with our parent company, subsidiaries, joint ventures, or other companies under a common control (“**Affiliates**”), in which case we will require our Affiliates to honor this Privacy Policy.
 - **Corporate Restructuring.** We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction, or other proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

AS A RESULT, WE MAY PROVIDE YOUR PERSONAL DATA TO A THIRD PARTY COMPANY. BECAUSE WE DO NOT CONTROL THE PRIVACY PRACTICES OF THESE THIRD PARTY COMPANIES, YOU SHOULD READ AND UNDERSTAND THEIR PRIVACY POLICIES.

NOTICE TO CALIFORNIA RESIDENTS REGARDING YOUR CALIFORNIA PRIVACY RIGHTS (AS PROVIDED BY CALIFORNIA CIVIL CODE SECTION 1798.83) – A CALIFORNIA RESIDENT WHO HAS PROVIDED PERSONAL DATA TO A BUSINESS WITH WHOM HE/SHE HAS ESTABLISHED A BUSINESS RELATIONSHIP FOR PERSONAL, FAMILY, OR HOUSEHOLD PURPOSES (A “CALIFORNIA CUSTOMER”) MAY REQUEST INFORMATION ABOUT WHETHER THE BUSINESS HAS DISCLOSED PERSONAL INFORMATION TO ANY THIRD PARTIES FOR THE THIRD PARTIES’ DIRECT MARKETING PURPOSES. IN GENERAL, IF THE BUSINESS HAS MADE SUCH A DISCLOSURE OF PERSONAL DATA, UPON RECEIPT OF A REQUEST BY A CALIFORNIA CUSTOMER, THE BUSINESS IS REQUIRED TO PROVIDE A LIST OF ALL THIRD PARTIES TO WHOM PERSONAL DATA WAS DISCLOSED IN THE PRECEDING CALENDAR YEAR, AS WELL AS A LIST OF THE CATEGORIES OF PERSONAL DATA THAT WERE DISCLOSED. CALIFORNIA CUSTOMERS MAY REQUEST FURTHER INFORMATION ABOUT OUR COMPLIANCE WITH THIS LAW BY E-MAILING SUPPORT@CROSSLEAD.COM. PLEASE NOTE THAT WE ARE REQUIRED TO RESPOND TO ONE REQUEST PER CALIFORNIA CUSTOMER EACH YEAR AND WE ARE NOT REQUIRED TO RESPOND TO REQUESTS MADE BY MEANS OTHER THAN THROUGH THIS E-MAIL ADDRESS.

- **Other Disclosures.** Regardless of any choices you make regarding your Personal Data (as described below), the Company may disclose Personal Data if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on the Company; (c) to protect or defend the rights or property of the Company or users of the Site or services; and/or (d) to investigate or assist in preventing any violation or potential violation of law, this Privacy Policy, or our Terms of Use.

7. **Third Party Websites.** Our Site may contain links to third party websites. When you click on a link to any other website or location, you will leave our Site and go to another site and another entity may collect Personal Data or Anonymously Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your Personal Data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content, or websites.
8. **Your Choices Regarding Your Personal Data.** You have several choices concerning use of your information with regard to our Site:
 - **E-mail Communications.** We will periodically send you free newsletters and e-mails that directly promote the use of our Site or products and services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us by following the unsubscribe instructions provided in the e-mail or by contacting us directly. Despite your indicated e-mail preferences, we may send you service-related communications, including notices of any updates to our Terms of Use or Privacy Policy.
 - **Cookies.** If you decide at any time that you no longer wish to accept Cookies from our Site for any of the purposes described above, you can instruct your browser to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser's technical information in order to change its settings. Please be aware that if you do not accept Cookies you may not be able to use all portions or functionality of the services on our Site.
 - **Changing or Deleting Your Personal Data.** All users may review, update, correct, or delete the Personal Information in their Account by contacting us or by editing their Account via the Site. If you completely delete all of your Personal Information, your Account may become deactivated. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes.
9. **Changes to This Privacy Policy.** This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy (with revised "Last Updated" date) on our Site. You should consult this Privacy Policy regularly for any changes.