GPS Radar Privacy Policy

Last Updated: May 15, 2018

This user privacy policy ("**User Policy**") describes the policies and procedures of Launchmetrics on the collection, use and disclosure of your information, and what choices you have with respect to the information on gpsradar.launchmetrics.com (the "**Site**") and the services, features, content or applications we offer (collectively with the Site, the " **Services**").

When we refer to Launchmetrics (collectively referred as Launchmetrics, "we", "us", "our" in this Privacy Policy), we mean the Launchmetrics entity that acts as the Controller of your personal data as a user of the GPS Radar Service.

When we refer to users ("**Users**") we mean all individuals who are GPS Radar account holders, including those users granted access to the Services via their employer or another company ("**Authorized Users**").

When we refer to Launchmetrics network ("**Launchmetrics Network**") we refer to a Brand or Agency or Media or Buyer or Retailer or Influencer or User that has subscribed to the Launchmetrics paying or non-paying Services including Launchmetrics employees.

When we refer to customers ("**Customers**") we refer to a Brand or Agency that has subscribed to the Launchmetrics customer facing platforms and modules (including but not limited to Contacts, Events, Samples, Galleries, Discover, Influencer by Launchmetrics)

We receive information about you from various sources, including: (i) if you register for the Site and the Services, through your User account on the Services (your "Account"), and (ii) your use of the Services generally; and (iii) from third party websites and services. When you use the Services, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy.

Updates in this version of the User Policy reflect changes in data protection law. In addition, we have worked to make the User Policy clearer and more understandable.
To find more quickly the information you are looking for, please look at our table of contents:

Please read this statement carefully to understand our policies and practices regarding your information and how we will treat it.

What Does This Privacy Policy Cover?

This User Policy covers the treatment of personal data ("**Personal Information**") gathered when you are using or accessing the Services. This User Policy also covers our treatment of any Personal Information that our business partners (Customers or third parties) share with us or that we share with our business partners.

Once you have consented to Radar, you also consent to be contacted by Launchmetrics Network Members and Customers for:
- events invitation and attendance emails;
- samples loans;
- galleries and lookbooks;
- newsletters, press releases, email campaigns sharing.

We may share your data with Customers by allowing them access to the database through our various online platforms for dedicated campaigns and analysis.

This User Policy does not apply to the practices of third parties that we do not own or control, including but not limited to any third party websites, services and applications ("**Third Party Services**") that you elect to access through the Service or to individuals that we do not manage or employ. While we attempt to facilitate access only to those Third Party Services that share our respect for your privacy, we cannot take responsibility for the content or privacy policies of those Third Party Services. We encourage you to carefully review the privacy policies of any Third Party Services you access.

In addition, a separate agreement governs delivery, access and use of the Services (the "**Service Provider Agreement**") and the processing of Customer Data.

What Information Do We Collect and Receive?

The information we gather enables us to personalize, improve and continue to operate the Site. In connection with certain aspects of the Site, we may request, collect and/or display

some of your Personal Information. We collect and receive Data and other information in different ways:

- **User Data or Account Information**. Authorized Users routinely submit User Data to Launchmetrics when using the Services.

When you create an Account, you will provide information that could be Personal Information, such as your **username, password, email address, affiliations and other requested information.** You acknowledge that this information may be personal to you, and by creating an account on the Services and providing Personal Information to us, you allow others, including us, to identify you and therefore may not be anonymous. We may use your contact information to send you information about our Services. You **may unsubscribe from these messages using directly the unsubscribe link on the messages.** Although we reserve the right to contact you but only when we believe it is necessary, such as for account recovery or security purposes.

- **Other information.** Launchmetrics also collects, generates and/or receives other information:

I.   **Usage Information:**
- **IP address information and other information collected automatically**

We automatically receive and record information from your web browser when you interact with the Services, including your IP address and Cookie information.

Generally, the Services automatically collect usage information, such as the number and frequency of visitors to the Site. We may use this data in aggregate form, that is, as a statistical measure, but not in a manner that would identify you personally. This type of aggregate data enables us and third parties authorized by us to figure out how often individuals use parts of the Services so that we can analyze and improve them.

- **Log Data**

 As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use our Websites or Services and record it in log files. This log data may include the Internet Protocol (IP) address, the address of the web page visited before using the Website or Services, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data.

We collect log information (IP addresses or users' information) for different reasons like:
- Detecting or preventing fraud, and unauthorised access;
- Help users and address their needs while using the platform;
- Keep improving our product in terms of features scope and security needs.

- **Device Identifiers**

When you access the Site or the Services by or through a mobile device (including but not limited to smartphones or tablets), we may access, collect, monitor and/or remotely store one or more "device identifiers," such as a universally unique identifier. Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device's operating system or other software, or data sent to the device by us. A device identifier may convey information to us about how you browse and use the Site and the Services. A device identifier may remain persistently on your device, to help you log in faster and enhance your navigation through the Site. Some features of the Site and Services may not function properly if use or availability of device identifiers is impaired or disabled.

- **Location Data**

When you access the Site by or through a mobile device, we may access, collect, monitor and/or remotely store "location data," which may include GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device. Location data may convey to us information about how you browse and use the Site and Services. Some features of the Site and Services, particularly location-based services, may not function properly if use or availability of location data is impaired or disabled.

- **Aggregate Information**

We collect statistical information about how both unregistered and registered users, collectively, use the Services ("**Aggregate Information**"). Some of this information is derived from Personal Information. This statistical information is not Personal Information and cannot be tied back to you, your Account or your web browser, unless you give us the explicit agreement to do so.

- **Social Media features**

Our Site includes widgets, such as the "Share This" button that belongs to Facebook. These features may collect your Internet protocol address, which page you are visiting on the Site, and may set a Cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Site. Your interactions with these features are governed by the privacy policy of the companies that provide them.

II.   Cookies Information:

We use cookies and similar technologies in our Sites and Services that help us collect other information. The Sites and Services may also include cookies and similar tracking technologies of third parties, which may collect information about you via the Sites and Services and across other websites and online services.

Our cookies might, contain Personal Information (IP address), but we do not combine the general information collected through cookies with other Personal Information to tell us

who you are. As noted, however, we do use cookies to identify that your web browser has accessed aspects of the Site.

Domain	Company name	Description	Duration
Own	Launchmetrics	Help us track internet usage as described above.	Session and deleted from your machine when your web browser closes
Own	Launchmetrics	Remember your information and settings when you visit them in the future so you will not have to login again	Persistent but no longer than 13 months.

If you do not want Cookies to be dropped on your device, you can adjust the setting of your Internet browser to reject the setting of all or some Cookies and to alert you when a Cookie is placed on your device. For further information about how to do so, please refer to your browser 'help' / 'tool' or 'edit' section or see www.allaboutcookies.org. Please note that if you use your browser settings to block all Cookies (including strictly necessary Cookies) you may not be able to access or use all or parts or functionalities of our Sites.

If you want to remove previously-stored Cookies, you can manually delete the Cookies at any time. However, this will not prevent the Sites from placing further Cookies on your device unless and until you adjust your Internet browser setting as described above.

Below are pages describing these settings in more detail for each browser.
- Chrome
- Firefox
- Internet Explorer 7 en 8
- Internet Explorer 9
- Safari
- Opera

If you use multiple browsers (e.g. Internet Explorer, Google Chrome, Firefox, etc) you must repeat this procedure with each one, and if you connect to the web from multiple devices (e.g. from work and at home), then you will need to set your preferences on each browser on each device.

We strongly recommend that you leave cookies active, because they enable you to take advantage the most attractive features of the Site but this remains your personal choice.

For more information on the development of user-profiles and the use of targeting/advertising Cookies, please see www.youronlinechoices.eu if you are located in Europe or www.aboutads.info/choices if in the United States.

III.   Profile Information:

The Service may permit you to allow your Profile Information to be shared with members of our network, including with leading FLC brands and PR firms. If you participate in the network, your information will be made available and may be shared with other individuals and businesses within the Launchmetrics network only. You can choose to disclose or not your email address using your profile settings.

How Do We Use The Data Collected?

The Site is designed to help you share information with others. As a result, some of the information generated through the Site is shared with Community Insiders or with third parties.

Customer or User Data will be used by Launchmetrics in accordance with Customer or User instructions, including any applicable terms in the Service Provider Agreement and User's use of Services functionality, and as required by Applicable laws.

Different Launchmetrics entities provide the Services in different parts of the world. Data protection laws in certain jurisdictions differentiate between the "controller" and "processor" of information.

1)   **We collect usage data and cookie data to help us create, develop, operate,**

and improve the Site, and our content.The purpose of this data processing is to provide you with our Services and to facilitate and protect your navigation on our Site. From time to time, we may use your personal information to send important notices, such as communications about changes to our terms, conditions, and policies. **If you do not want to be contacted for such purpose, please email us at** support@launchmetrics.com**.**

Public Information about Your Activity on the Services:
Some of your activity on and through the Services is public by default. This may include, but is not limited to, content (i.e. events, galleries, links, press releases etc.) you have posted publicly on the Site or otherwise through the Services. Users may have some of this information associated with their Accounts. Please also remember that if you choose to provide Personal Information using certain network features of the Services, then that information is governed by the privacy settings of those particular features and may be available to others. Individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge. We therefore urge you to think carefully about including any specific information you may deem private in content that you create or information that you submit through the Services.

IP Address Information:
While we collect and store IP address information, that information is not made public. We do at times, however, share this information with our partners, service providers and other persons with whom we conduct business, and as otherwise specified in this Privacy Policy.

Aggregate Information:
We share Aggregate Information with our partners, service providers and other persons with whom we conduct business. We share this type of statistical data so that our partners can understand how and how often people use our Services and their services or websites, which facilitates improving both their services and how our Services interface with them. In addition, these third parties may share with us non-private, aggregated or otherwise non Personal Information about you that they have independently developed or acquired.

User Profile Information:
User Profile Information including your username and other information you enter may be displayed to other users to facilitate User interaction within the Services. We will not directly reveal User email addresses to other users. Except in the following case, where you as a User (requestor) uses certain features in attempts to contact another User (for example a content creator).

As a GPS Radar User, any Launchmetrics Network members are able to search for and view your Profile Information as a part of the "**Radar Industry List**", and then import it into their database. When they import your Profile Information into their database, a new record is made in their database with a copy of your Profile Information. Additionally, a link is created between your Radar Profile and this new record. This functionality is what allows you to see all of your event invitations, across many event organizers, in your Radar account.

Launchmetrics Network members who already obtained your information through other means, and have a record of your information in their database, can also manually link this record to your GPS Radar account so as to allow you to RSVP to their events within your Radar account. This link can additionally be made through an automatic matching process. Lastly, this link can also be made by you, by logging into or creating a GPS Radar account via the event organizer's RSVP portal.

We would like to remind you that once a link is established between your Radar profile and a database record, the Customer can then send you:

- events invitations and attendance emails;
- samples loans;
- galleries and lookbooks;
- newsletters, press releases and email campaigns.
And collect your interactions (clicks and openings) with these materials knowing that the Customer has the obligation to give you the possibility to view or update your profile shared with him or completely opt out.

We may share your data with Customers by allowing them access to the database through our various online platforms for dedicated campaigns and analysis

Please Note that once they import your Radar Profile Information into their database, they are the **Data Controllers** of that copy and may possibly make changes to that copy since it resides in their database. These Customers are obligated after a reasonable amount of time to provide you with a copy of their own Privacy Policy, as well as a way to View, Update or Opt out of storing/processing the copy that resides in their database.

If a Customer in the Launchmetrics Network posts a Gallery through the Launchmetrics enterprise platform, and you interact with that Gallery in any way like View, Share, Download, Request, then its users will see a log of this activity that includes the date/time and your Radar Profile Information.

If a Customer in the Launchmetrics Network shares with you a Private Gallery on their Galleries portal, and you interact with that gallery by Viewing, Requesting or Downloading it, and if your browser is already logged into Radar or you manually log into Radar through that portal, the Customer and its Users will see a log of this activity that includes the date/time and your Radar Profile Information.

You do have the option of HIDING your email address within the Radar Industry List or Gallery activities so that Customers of the Launchmetrics network are not able to view or copy it into their database. You can do this in the **Edit Profile Page > Data Privacy page**. Note that by hiding your email address, this does not retroactively remove it from those

Customers that had already copied it over. Also, hiding your email address does not hide you from the Industry List in general, only your email address.

Information Shared with Our Agents:
We employ and contract with people and other entities that perform certain tasks on our behalf and who are under our control (our "Agents"). We may need to share Personal Information with our Agents in order to provide products or services to you. Unless we tell you differently, our Agents do not have any right to use Personal Information or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of Personal Information with our Agents.

Information Disclosed Pursuant to Business Transfers:
In some cases, we may choose to buy or sell assets. In these types of transactions, User information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, User information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

Information Disclosed for Our Protection and the Protection of Others:
We also reserve the right to access, read, preserve, and disclose any information as it reasonably believes is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request, (ii) enforce these Terms of Service, including investigation of potential violations hereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, (iv) respond to User support requests, or (v) protect our rights, property or safety, our Users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

Information We Share With Your Consent:
Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and will be able to prevent the sharing of this information.

Is Information About Me Secured?

We work hard to secure your Personal Information from unauthorized access to or unauthorized processing, alteration, disclosure or destruction of Personal Data we hold by taking appropriate Technical and Organisational Security Measures, having regard to the state of the technological development and the cost of implementing any measures where appropriate, for example, pseudonymisation and encryption of Personal Data.

Your Account information will be protected by a password for your privacy and security. You need to prevent unauthorized access to your Account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer and browser by signing off after you have finished accessing your Account.

We seek to protect Account information to ensure that it is kept private; however, we cannot guarantee the security of any Account information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of User information at any time.

We otherwise store all of our information, including your IP address information, using industry-standard techniques. We do not guarantee or warrant that such techniques will prevent unauthorized access to information about you that we store, Personal Information or otherwise.

Where it is likely that a breach results in a risk to the rights and freedoms of individuals, we will notify the relevant supervisory authority within 72 hours of the becoming aware of it. This information can be provided in phases to facilitate a fast and efficient reporting.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, we will notify those concerned directly with the following information:

- The nature of the personal data breach including, where possible:
- the categories and approximate number of individuals concerned; and
- the categories and approximate number of personal data records concerned.
- The name and contact details of the data protection officer or other contact point where more information can be obtained.
- A description of the likely consequences of the personal data breach.
- A description of the measures taken, or proposed to be taken, to deal with the personal data breach and, where appropriate, of the measures taken to mitigate any possible adverse effects.

The servers that store your data have appropriate administrative, technical, and physical controls that are designed to safeguard your data, including industry-standard encryption technology.

If you have any questions or concerns regarding security using the Site, please send us a detailed message to security@launchmetrics.com. We will make every effort to answer your concerns.

California Privacy Rights (for California residents)

Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of Personal Data that we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this

notice, please submit a written request to the following address: Launchmetrics, 180 Varick Street, Suite 1128, New York NY 10014 USA.

Your rights under GDPR (for EEA residents)

Under General Data Protection Regulation (GDPR), Users have the right to ensure:

- we process your data fairly and lawfully within the consent you have provided us.
- your data is accurate.
- your data is secure.

As a User, you can:

- ask confirmation of whether, and where, a Controller is processing Personal Data;
- ask us to provide details of the Personal Data we hold on you (information about the purposes of the processing, the categories of Data being processed, the categories of recipients with whom the Data may be shared,and obtain a copy of the Personal Data being processed (see the contact information below);
- know how long we keep your Personal Data;
- use your rights to erasure, to rectification, to restriction of processing and to object to processing, or to complaint to relevant authorities;
- obtain information regarding the source of the Data if the Data were not collected directly from you ; and
- obtain information about the existence of, and an explanation of the logic involved in, any automated processing that has a significant effect on you or other data subjects.

We will maintain complete and accurate records and information to demonstrate our compliance with our obligations under this Privacy Policy and also for audits conducted by you or on your behalf.

To exercise any of these rights, please contact us at security@launchmetrics.com or by mail to Launchmetrics, 180 Varick Street, Suite 1128, New York NY 10014 USA, Attention: Privacy. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

How Long Do We Conserve Your Data?

Launchmetrics will retain User Data and Customer Data in accordance with a User's instructions, including any applicable terms in the Service Provider Agreement and User's use of Services functionality, and as required by Applicable Law. The Profile Information will be retained for the period needed to interact with User but no longer than 3 years from the

latest log or interaction with the Service and may be retained in an anonymised form thereafter. Which means you will not be able to be identified when the data is anonymised.

What Happens When There are International Data Transfers?

We are a global organisation, as such, we may share information about you within Launchmetrics offices and with affiliates and transfer it to countries in the world where we do business in connection with the uses identified above and in accordance with this Privacy Policy.

In some cases, we use suppliers located in various countries to collect, use, analyse, and otherwise process information on its behalf. It is our practice to require such suppliers to handle information in a manner consistent with our policies and applicable laws.

For transfers of personal data outside of the EEA, we are making sure that any of these transfers are supported by the strict legal compliance of our suppliers to the GDPR. When necessary, compliance can be achieved if suppliers use an approved certification mechanism such as the EU-US Privacy Shield. This framework was developed to establish a way for companies to comply with data protection requirements when transferring personal data from the European Union to the United States.

We also offer EU Standard Contractual Clauses (also called Model Clauses), to meet the GDPR requirements for our customers who operate in the E.U.

How do I Review or Change my Personal Data?

If you are an Authorized User, you can access and change information associated with your Account by logging into the Services. Registered Users can access and delete cookies through their web browser settings.

If you would like to review or change your Personal Data, you can do so directly from your User profile once logged in or we will deal promptly and appropriately with any inquiries unless we have to keep that information for legitimate business or legal purposes. However, if your requests are deemed to be excessive or complex a small fee may be charged and a time-period extension may apply.

You can contact us at: security@launchmetrics.com.

How Can I Delete My Account?

Should you ever decide to delete your Account, you may do so by clicking on "**Request to opt out of GPS Radar**" or by emailing support@launchmetrics.com or your Account manager. If you terminate your Account, any association between your Account and information we store will no longer be accessible through your Account.
Please note that we will need to verify that you have the authority to delete the Account, and activity generated prior to deletion may remain stored by us for the period of time needed for us to conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

What Happens When There Are Changes to this User Policy?

Although most changes are likely to be minor, Launchmetrics will occasionally update this User Policy to reflect User and Customer feedback about the Site Changes and clarifications will take effect immediately upon their posting on this Site. Launchmetrics encourages you to periodically review this User Policy to be informed of how we are protecting your information and check for any changes. We have the sole discretion to modify this User Policy. If we make changes that materially alter your privacy rights, we will provide additional notice, such as via email or through the Services.

Do you have a Data Protection Officer?

Yes, if you would like to communicate with our Data Protection Officer, please email: dpo@launchmetrics.com.

How to contact us?

If you have any questions or concerns regarding privacy using the Site, please send us a detailed message to support@Launchmetrics.com. We will make every effort to resolve your concerns.