



SOOM

PRIVACY POLICY

www.soom.com/privacy-policy

Last updated May 29, 2019

At Soom, the privacy of our users and visitors are very important to us. The purpose of this privacy policy is to provide you with a description of the types of personal information we collect about you when you use our applications, websites, content, products and services and how we use that information. This Privacy Policy only applies to personal information collected about you while you are accessing or using the Services. By registering to use the Services or otherwise accessing the Services, you accept this Privacy Policy and certify that you have reviewed it. **IF YOU DO NOT AGREE WITH ANY OF THE TERMS SET FORTH HEREIN, PLEASE DO NOT USE THE SERVICES OR REGISTER TO USE THE SERVICES.**

In this document, references to "Soom", "Company", "we" "us" or "our" means Soom, Inc., a Delaware corporation, "you" or "your" means the users of or visitors to our website and Services, "Privacy Policy" means this privacy policy, and "Services" means our applications, websites, content, and products and services.

HOW DO WE COLLECT INFORMATION, WHAT DO WE COLLECT AND HOW DO WE USE IT?

We collect and store information that you voluntarily provide to us as well as data related to your use of the Services. Below is a more specific list of the personal information we collect and how we use it with your consent. You may be asked additional questions regarding items on this list to ensure we have your consent to collect and use your personal information for specific purposes.

- **Support Requests:** When you contact us for support, we may collect personal information as part of the support process, including but not limited to your name, username, address, telephone number, mobile number, email address, and other information from which your identity is or may be discernible.
- **Enterprise Access:** If you are an enterprise customer (as opposed to an individual user), we may require you provide us with contact information for administrators or finance personnel as part of the setup and provision of services to you and your users.
- **Surveys and User Research:** We may send you surveys or contact you with questions to provide us with feedback on our Services. We collect any responses that you provide. Participation in surveys or research tasks is elective and does not affect your access to the Services.

In addition, we may collect certain aggregate information and analytical data related to your use of the Services (see “Use of Cookies” below). Aggregate information is non-personally identifiable or anonymous information about you, and may include the date and time of your visit, information about your usage of, and interaction with, our software, the Services, the IP address of your computer or mobile device, your computer or mobile device browser information, the internet address that you visited prior to and after reaching the Services, the name of the domain and host you used to access the internet, the type of mobile device you use, your mobile device’s unique device ID, the features of the Services which you accessed, and correspondences between you and us. This data is not associated with your personally identifiable information. We may also use cookies and web beacons to track your interaction with the Services, and to customize our Services for you.

HOW DO WE USE INFORMATION WE COLLECT?

Our primary purpose in collecting information is to provide you the Services. We may use the information you provide to us for other purposes as follows:

- **Support the Services:** We may use the information you provide us to provide any customer support you request, including troubleshooting problems, and monitor such requests, and to inform you about updates to the Services.
- **Improve the Services:** We may use the information you provide us to customize, measure, and improve the Services, including through data analysis, testing, research, statistical and survey processes.
- **Enforce Rights:** We may use the information you provide us to enforce your and our rights (including payment for the Services in the case of enterprise users) and protect you against fraud.
- **Marketing Purposes:** We occasionally may contact you about new product and features. You may remove your name from our mailing lists to stop receiving these emails.

If you have any questions regarding the foregoing, or our privacy practices, you may contact us at info@soom.com.

CAN WE USE DE-IDENTIFIED INFORMATION?

In addition to the uses of personal information above, we may remove the identifiable parts of your information to create de-identified forms (“De-identified Information”). De-identified Information may be compiled with other data in aggregated forms. We use this aggregated or non-aggregated data in the following ways:

- **Disclosure for Business Purposes:** We may also license, sell or otherwise share De-identified Information with clients, partners, investors and contractors for any purposes related to our business practices.
- **Services Improvement:** We may use De-identified Information for product improvement including to the Services as well as share it with third-parties to evaluate their products or services.
- **Research:** We may use De-identified Information for research whether scientific, marketing, or business in nature. This research may be made public through publication such as within a scientific journal.

HOW DO WE SHARE THE INFORMATION WE COLLECT?

We do not sell, rent, trade or otherwise transfer personally identifiable information to third parties who are not our affiliates without your consent to do so. We may, however, disclose personally identifiable information: to our affiliated companies, carriers, third party service providers and/or agents, as reasonably necessary to provide you with the Services you have requested; as required by law or legal process; in response to lawful requests for information by governmental agencies, such as law enforcement authorities, authorized to request such information; to enforce our contractual agreements, including investigation of potential violations thereof; to help detect and prevent potentially illegal acts and violations of our policies and to otherwise protect our interests; to help detect and prevent harm to persons or property or otherwise to protect public safety; to third parties that perform functions on our behalf, including, but not limited to, third parties that host or operate our Services, analyze data, perform email list management services, provide customer service, or provide public relations and marketing services; and to vendors of products and services that are offered through the Services.

We are not limited in our use of non-personal information that does not permit direct association with any specific individual, or non-identifiable aggregate information about our users (such as the number of users on the Services and the geographic distribution of our users). As such, in no way to limit the foregoing, we may share aggregate (non-personally identifiable) information with certain third parties such as advertisers, industry organizations, and prospective affiliates.

We do not enable third parties, except for certain of our subcontractors, to collect information directly from users while they interact with Services. Our subcontractors only collect and use information at our direction and only to support the functioning of the Services and to perform analytics. Our subcontractor may not share this information with third parties.

As with any other business, it is possible that in the future we could sell or buy subsidiaries or business units. In any such transaction, as well in the event all or substantially

all of our assets are acquired by a third party, personal information of our users will generally be one of the transferred assets. We reserve the right to include your personal information, collected as an asset, in any such transfer to a third party.

Information collected by or sent to us may be stored and processed in any country in which we and our affiliates, subsidiaries, or service providers maintain facilities. We reserve the right to transfer your personal information outside of the country where you reside and/or from which you use our Services. By using our Services you consent to any such transfer of information outside of your country.

HOW LONG IS YOUR PERSONAL INFORMATION KEPT BY US?

We will retain your personal information for as long as reasonably necessary to: provide the use of our Services; invoice charges and to maintain records until invoices cannot be lawfully challenged and legal proceedings may no longer be pursued; communicate with you regarding other Services that we offer; comply with applicable laws, regulations, and court orders; enforce our contractual agreements; or fulfill any of the purposes for which we collected the personal information as listed in this Privacy Policy.

WHAT ARE COOKIES AND HOW DO WE USE THEM?

A "Cookie" is a simple text file stored on your computer or device for use by a browser. Certain Services features may only be available through the placement of a cookie. We may use "cookies" to assist in data collection and to track visitor Services usage and trends to help us better serve you. The use of cookies is a standard practice among internet web sites; most internet browsers permit a user to accept, decline or delete cookies. We may use persistent cookies to make it easier for you to navigate the Services. Specifically, we may use persistent cookies to track whether you are logged into the Services. A persistent cookie may remain on your local device for an extended period of time. You can remove persistent cookies by following directions provided in your internet browser's "help" function. We may set a persistent cookie to store how you came to the Services and what items you interact with during your visit. Persistent cookies also enable tracking and targeting the interests of our users to enhance their experience on the Services. If you reject cookies, you will still be able to view contents through the Services, but your ability to use some areas of the Services may be limited. Some of our business partners (e.g., analytical tracking software providers) may use cookies and tracking technologies on the Services. We have no access to or control over these cookies or tracking technologies. This Privacy Policy covers the use of cookies on our Services and does not cover the use of cookies or tracking technologies by any such business partner.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We follow commercially accepted industry standards to protect the personal information submitted to or collected by us, both during transmission and once we receive

it. While we strive to use commercially acceptable means to protect your personal information, no method of transmission over the internet, or method of electronic storage, is 100% secure and we cannot guarantee its absolute security. In the event of an inadvertent disclosure of your personal information, we will take all commercially reasonable steps to limit and remedy the disclosure as required by the applicable law. In light of the foregoing, your use and access of the Services is at your own risk. If you have any questions about security of our Services, please contact us in the manner set forth under the heading "Contact Us" below.

CAN CHILDREN USE THE SERVICES?

The Services are intended for the use of users who are at least 18 years of age. The Services are not directed to persons under the age of 18. We do not knowingly collect or solicit information from, market to or accept services from persons under the age of 18 years old. If we become aware that a person under the age of 18 has provided us with personal information, we will take steps to remove such personal information.

HOW FAR DOES OUR RESPONSIBILITY EXTEND?

This Privacy Policy applies to the Services that are owned and operated by us. The Services and our communications to you may contain links to other third party sites that may offer products or services that our users might find useful. These third party sites may request information from you. In such instances, the collection and use of your personal information will be governed by the privacy policy applicable to that third party site. We do not and cannot control the privacy policies, contents or links that appear on these third party sites. We encourage you to review the privacy policies of any third party sites or services before providing any of them with your personal information. We accept no responsibility or liability for other third party sites or services.

HOW CAN YOU ACCESS OR AMEND YOUR PERSONAL INFORMATION (RIGHT OF OPT-OUT, ACCESS AND CORRECTION)?

You have the right to view, correct, complete or remove your personal information. Upon and subsection to verification of your identity, we will respond to requests to view, correct, complete or remove your personal information within a reasonable time.

We will make all reasonable efforts to accommodate requests to delete personal information unless it is required by law or for any lawful business purpose, and always will delete any personal information that we are required by applicable law to delete at your request.

You can help us maintain the accuracy of your information by notifying us of any changes to your personal information as soon as possible. Your rights to access, change, or

delete your personal information are not absolute. We may deny you such rights when required by law or if the request would likely reveal personal information about a third party.

To request opt-out, review, modification or removal of personal information, you should submit a written request to us at: info@soom.com

CAN EUROPEAN USERS USE THE SERVICES?

Our services are hosted in the United States and subject to laws of the United States. If you are visiting our web site or using our applications from outside the United States, you may be transferring your personal identifiable data into the United States if you submit your personal identifiable information to us. Many regions, such as the European Union, have data collection protections that differ from U.S. law.

While we are not subject to laws of the European Union, we will make reasonable efforts to provide you with information about your personally identifiable information held by us, to allow you to verify that the information is accurate and relevant for the purposes for which we collected it, and to correct or remove any information that is incorrect, or opt-out of collecting or storing that information. To request opt-out, review, modification or removal of personal data, you should submit a written request to us at privacy@soom.com. Our compliance with the foregoing may be limited by the need to retain information for legal or other compliance purposes.

CAN THIS PRIVACY POLICY BE MODIFIED?

Each time you use or access the Services, the current version of the Privacy Policy will apply. Accordingly, when you use the Services, you should check the date of this Privacy Policy (which appears at the top of the Privacy Policy) and review any changes since the last version. We will occasionally update this Privacy Policy to reflect changes in our Services and/or business practices. You are encouraged to check regularly for any changes to this Privacy Policy. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you. We will not materially change our policies and practices to make them less protective of user information collected in the past without the consent of affected users. You agree that your continued use of the Services shall constitute your acceptance of the Privacy Policy as revised.

WHAT LAW APPLIES TO THIS PRIVACY POLICY?

This Privacy Policy is governed by the laws of the Commonwealth of Massachusetts, without giving effect to any principles of conflict of law. If you are outside of the United States, your information will be processed and stored in the United States and you consent to such processing and storage under the laws of the United States.

CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits customers who are California residents and who have provided us with “personal information” (as that term is defined in Section 1798.83) to request certain information about the disclosure of that information to third parties for their direct marketing purposes. If you are a California resident with questions regarding this, please contact us in the manner set forth under the heading “How can you contact us?” below.

HOW CAN YOU CONTACT US?

To contact us with your questions or comments regarding this Privacy Policy or our information collection and dissemination practices, please contact us at: info@soom.com or +1 (617) 674-8209

