

# Privacy Policy

Last updated on December 9, 2019

Global Nomads Group (“GNG”, “we”, “us” or “our”) takes the protection of your personal data very seriously. Please read the following privacy policy (“Privacy Policy”) carefully as it explains what information you share with us and others when you participate in the Program, what information we collect, how we use it, whom we share it with, and the controls we give you to access, update, and delete the information which you provide us while participating in the Program.

Your participation in the Program signifies that you have read, understand and agree to all terms within this Privacy Policy. If you do not agree with any portion of this Privacy Policy, we ask that you please do not participate in the Program. All capitalized terms used herein shall have the meaning stated in the Terms, unless stated otherwise.

When we use the term “Personal Information” we mean any information that we collect in connection with the Program that would allow someone to identify you or contact you, such as your full name, address, e-mail address or telephone number. When we use the term “Additional Information”, we mean any information that we collect about you in connection with your participation in the Program other than Personal Information, including through the Program’s website (the “Website”). Additional Information may include, but not be limited to, (i) usage information and details about how you use the software and services made available to you as part of the Program, (ii) technical information provided as part of your access and use of the Website (e.g., browser and device information, access times and other relevant statistics, pages viewed and content searched and identifiers associated with cookies); and (iii) content you provide us in connection with the Program. Personal Information and Additional Information shall be collectively referred to as “Information”.

## 1. HOW WE USE AND COLLECT INFORMATION

**Registration.** When you register to the Program, we will require you to provide certain Information, which may include, but not be limited to, your full name, country, email address, telephone number, date of birth, etc. This Information will be used to administer your participation in the Program. If an account is or will be required in connection with your participation in the Program, this information will also be used to administer and verify access to your account.

**Program Features.** We use your Information to provide you with the Program that we are improving all the time. We use your Information to (i) develop, operate, improve, deliver, maintain, and protect the Program; (ii) personalize the Program and contextualize your experience; (iii) enhance the safety and security of our Program; (iv) verify your identity and prevent fraud or other unauthorized or illegal activity; and (v) enforce our Terms and other policies. You therefore agree to provide us with whatever Information you create, submit, upload, send or transmit in connection with the Program.

**Communications.** You may be presented with the opportunity to sign up to receive newsletters, email communications, or other communications from us in order for us to provide up-to-date information about the Program, and to publicize and promote certain content, products and services offered by us or our business partners that we think may interest you. For details on how to “opt-out” from such communications, see Section 4 below (“Newsletters, Promotional Materials, Support Communications, etc.”). If an account is or will be required in connection with your participation in the Program, we may also use your Personal Information to access your user account in order to respond to any technical support requests. When you initiate any communications with us, whether it be as part of a general

query, a support request, or any other communication via the Website or by email, you consent that we will use your Personal Information and whatever information you volunteer, to communicate with you and to best assist you with your questions or needs.

**Data Collection and Analytics.** Our Website includes features that automatically collect Additional Information regarding your access and use of the Website. This Additional Information is used to assist us in keeping track of your preferences, create a more tailored user experience and better serve your particular interests and needs.

The Website or certain third parties that we partner with may use “cookies,” (which are small data files containing information about you that is stored on your hard drive), “embedded scripts”, web beacons, web storage, unique identifiers, and other similar technologies (collectively, “Cookies”) to automatically collect Additional Information as you interact with the Website over time and combine it with similar information from other services and companies. Cookies enable us to track your interaction with the Website, and target your interests to enhance your experience with the Website. We may also use the Information to analyze and regularly improve the use of our Website as well as other data analytics purposes. We may associate the Information obtained through these Cookies with your Personal Information so we can better customize your experience using the Website and provide tailored advertisements and promotions related to your specific interests. By using the Website, whether as a registered user or otherwise, you acknowledge, understand and agree that you are giving us your consent to track your activities and your use of the Website in accordance with this Privacy Policy.

You may have the ability to accept or decline certain Cookies. Most web browsers accept these Cookies by default, but you can usually configure your browser settings and, for example, refuse the acceptance of third party Cookies or all Cookies. Please note that if you choose to do so, you may not be able to enjoy the full functionality and all features of our Website.

The Website may also use a variety of third party advertising networks, data exchanges, traffic measurement service providers, analytics and advertising service providers and other third parties to, for example, analyze and track data, determine the popularity of certain content, and better understand your online activity. They may also be used to serve advertisements on the Website, facilitate targeting of advertisements or measure and analyze advertising effectiveness or traffic on the Website.

## 2. SHARING AND DISCLOSURE OF INFORMATION

**General Disclosure.** Generally, we do not sell, rent, lease or disclose your Personal Information to third parties, except if you consent to such disclosure or as otherwise described in this Privacy Policy. Any of our affiliated companies, including all of their respective business units may obtain from us and be able to use your Personal Information in accordance with this Privacy Policy. We may share, disclose or sell Additional Information to third parties, but we do not disclose Personal Information to them, except as described in this Privacy Policy.

**Service Providers.** We may disclose your Personal Information to third parties, business partners, service providers, vendors, and affiliates (“Service Providers”) for the purpose of administering, maintaining and supporting the Program and operations in connection therewith. We use Service Providers to efficiently provide the full range of content, activities and services we bring you and we also disclose your Information to such Service Providers for the purpose of providing services to us in connection with the Program. These Service Providers may store some Information on their servers, but they may only use your Personal Information to provide us with a specific service and not for any other purpose and agree to keep such Personal Information secure and confidential.

**Business Transfers and Sale.** If we are involved in a merger, acquisition, asset sale, financing, reorganization, liquidation, bankruptcy, or other transaction that includes the transfer of all or a some portion of our assets, your Information may be sold, transferred or shared as part of that transaction.

**Other Disclosures.** There may be other instances when we may use, access or share Information without asking for your consent or providing you with notice, in the following circumstances: (a) to protect or defend the legal rights or property of GNG, our affiliated companies or their employees, agents and contractors (including enforcement of our agreements); (b) to protect the rights, property, safety and security of GNG, the Program, its participants, or others; (c) to detect and resolve any fraud or security concerns; (d) to investigate, remedy, or enforce potential violations of our Terms, the House Rules, this Privacy Policy, or any additional terms; or (e) to comply with any legal process, governmental request, or applicable law, rule, or regulation.

### 3. RETAINING YOUR INFORMATION

**User Account.** If an account is or will be required in connection with your participation in the Program, we will retain the Personal Information submitted for your user account as long as you maintain an account associated with our Program or as is necessary to allow you to participate in the Program, or future email communications from us.

**Additional Information.** We will maintain Additional Information as long as is legally permissible in order to improve the Program that we provide.

**Legal Obligations.** Your Personal Information will be retained as necessary to comply with any applicable federal, state or local law and to conduct legitimate business activities, obligations, resolve disputes, and to enforce all of our agreements.

### 4. USER CHOICE; DELETING PERSONAL INFORMATION

This section sets out the procedure for accessing, viewing, modifying and deleting your Personal Information. You always have the right to ask to access and correct the Personal Information you have provided and generally you may review, update or delete certain information collected by us in connection with the Program at any time by following the instructions below.

**Accessing, Modifying, and Deleting Your User Account.** If you have registered for the Program (or, if applicable, created a user account) and you need to access, view, correct, modify or delete the Personal Information associated with your participation in the Program, you can do so by emailing us at [satt@gng.org](mailto:satt@gng.org) and requesting that your Personal Information be deleted. If an account is or will be required in connection with your participation in the Program, we may also delete your account and most of the Information we have collected about you if your account is inactive for a long period of time (but we will try to contact you prior to an account deletion initiated by us).

Keep in mind that, we cannot promise that deletion will occur within a specific timeframe. There may be legal requirements to store your Information and we may need to suspend those deletion practices if we receive valid legal process asking us to preserve such Information or if we receive reports of abuse or other Terms violations. Finally, we may also retain certain Information in backup for a limited period of time or as required by law.

**Portability.** If you would like to obtain a copy of the Personal Information you have shared with us in connection with the Program at any time, you can do so by emailing us at [satt@gng.org](mailto:satt@gng.org). Because your privacy is important to us, we may ask you to verify your identity or provide additional information before we let you access, update or download your Personal Information. We may also reject your request to do so for a number of reasons, including, for example, that the request risks the privacy of other users or is unlawful.

**Newsletters, Promotional Materials, Support Communications, etc.** If you consented to receiving such communications, you can unsubscribe by either following the specific instructions included in such communications or you may “opt-out” of receiving marketing and promotional emails from us at

any time by sending an email to us at [satt@gng.org](mailto:satt@gng.org) detailing your request. Please note that “opt-out” and “unsubscribe” requests may not take effect immediately and may take a reasonable amount of time to receive, process and apply, during which time your Information shall remain subject to the prior privacy settings. Additionally, you should be aware that any Information provided to third parties prior to your election to opt out or unsubscribe cannot be retrieved or rescinded by us unless required by applicable law, and you cannot retroactively opt out or unsubscribe with respect to such third parties through us. We may also have features that allow you to submit information, questions or feedback to us. In those instances, we may retain your emails and other information you submit to us for our internal purposes, and to help us and our Service Providers serve you better.

## 5. SECURITY

While no data transmission over the Internet is 100% secure from intrusion, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your Personal Information. However, regardless of our efforts, it is possible that third parties may unlawfully intercept or access transmissions or private communications over an unsecured transmission. We also limit access to your Personal Information by our own employees, contractors, Service Providers and those individuals who are authorized for the proper handling of such Personal Information. We request that our Service Provider follow similar standards of security and confidentiality.

## 6. THIRD-PARTY CONTENT AND INTEGRATIONS

As part of the Program as well as your use of the Website you may be provided with links to other websites or access to third-party content, resources, software, services or features, including services we jointly offer with such third-party. In particular, table conversations as part of the Program are currently hosted on a third-party web conferencing platform and are scheduled using a third-party scheduling tool. Through these links and third-party content or services, you may be providing Information (including Personal Information) directly to the third party, us, or both. **We encourage you to review the privacy policies of every third-party service that you visit or use, including those third parties you interact with in connection with the Program, to find out how those third parties collect and use your Personal Information.**

## 7. CHILDREN

Our services are not intended for—and we don’t direct them to—anyone under 13. Therefore, we do not knowingly or actively collect Personal Information from children under the age of 13. If you have reason to believe that any child under this age (or the minimum age based on your country/region or local law) has provided their Personal Information to us, please contact us at [satt@gng.org](mailto:satt@gng.org) and we will take steps to delete such Personal Information (and, if applicable, any associated user accounts).

## 8. ACCURACY

It is your responsibility to give us current, complete, truthful and accurate information, including Personal Information, and to keep such information up to date. **We cannot and will not be responsible for any problems or liability that may arise if you do not give us accurate, truthful or complete information or Personal Information or you fail to update such information or Personal Information.** We will reject and delete any Information that we believe in good faith to be false, fraudulent or inconsistent with this Privacy Policy.

## 9. PARTICIPANTS IN THE EUROPEAN UNION

If you're a participant in the Program residing in the European Union ("EU"), you should know that GNG is the controller of your Personal Information. Here is some additional information we would like to bring to your attention:

**Bases for Using Your Information.** Your country only allows us to use your Personal Information when certain conditions apply. These conditions are called "legal bases" and we typically rely on one of four: (i) contract you've entered into with us, (ii) a legitimate interest in using your Information, (iii) your consent; or (iv) any legal obligation.

**Your Right to Object.** You have the right to object to our use of your Personal Information. If there are types of Information you don't agree with us processing, you can contact us at [satt@gng.org](mailto:satt@gng.org).

**International transfers.** We may collect your Personal Information from, transfer it to, and store and process it in the United States and other countries outside of where you live. Whenever we share Information of EU users outside the EU we make sure to only process your Information in accordance with this Privacy Policy.

**Complaints.** If you're based in the EU, you can always file a complaint with the supervisory authority in your member state.

## 10. PRIVACY POLICY CHANGES

From time to time we may modify this Privacy Policy to reflect changes in the law, our Information collection, use and disclosure practices, features of the Program, or the technology we use or for any other reason. We will let you know about such modification by revising the date at the top of the Privacy Policy that is available on the Website or, in certain cases and at our sole discretion, provide you with additional notice such as adding a statement to our Website homepage. Modifications are effective upon posting. Your continued participation in the Program after we post a revised Privacy Policy signifies your acceptance of the revised Privacy Policy.

## 11. CONTACT US

If you have any questions about our privacy practices or any of the terms or conditions of this Privacy Policy, please feel free to contact us at [satt@gng.org](mailto:satt@gng.org).