

## WEBSITE PRIVACY POLICY

Last updated: February 2017

This privacy policy (the “Website Privacy Policy”) relates to the information collection and use practices of EigenRisk, Inc. (“EigenRisk,” “we,” “our,” or “us”) in connection with our Website.

This Website Privacy Policy does not apply to our collection and use practices in connection with your access to, and use of, the products and services that we offer for subscription. Those collection and use practices, including how we collect, protect, and use information you submit to our Platform, are detailed in, and governed by, our Master Subscription Agreement (for subscribers) and our Terms of Use – Guest User (for guests) together with the incorporated Platform Privacy Policy.

### Description of Users and Acceptance of Terms

This Website Privacy Policy applies to visitors to the Website. By accessing and using the Website, visitors are agreeing to the terms of the Agreement. Capitalized terms not defined in this Website Privacy Policy shall have the meaning set forth in our Terms of Use.

### The Information We Collect and/or Receive

In the course of operating the Website, EigenRisk will collect (and/or receive) the following types of information. You authorize us to collect and/or receive such information and assume contractual responsibility for obtaining all consents as required under applicable laws and regulations.

#### **1. Contact Information**

When you contact us through the “Contact Us” page, you will be asked to provide certain information which may include first name, last name, e-mail address, job title, name of your organization, country, state/region, and phone numbers (fax, cell, and/or landline) (“Contact Information”). The Contact Information is used to provide the requested service or information and to contact you for purposes of direct marketing of our current and future products and services.

#### **2. Other Information**

In addition to the Contact Information, we may collect or receive the following information:

- **From Your Activity.** In an ongoing effort to improve the Website and our products and services, we automatically collect certain information when you visit and use the Website. This information consists of IP addresses, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Website you visit, type of device you are using, Advertising Identifier (“IDFA” or “AdID”), operating system and version (e.g., iOS, Android or Windows), mobile carrier, geo-location data; network type (Wi-Fi, 3G, 4G, LTE), and similar information concerning your use of the Website (“Activity Information”).
- **From Cookies.** We also collect Activity Information by using “cookie” technology. Cookies are small packets of data that a website stores on your hard drive to “remember” information about your visit. We may use session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer/device until you delete them). If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Website may not function properly.
- **Analytics and Remarketing.** We use one or more third-party analytics services (such as Google Analytics) to evaluate your use of the Website, compile reports on activity based on Activity Information, and analyze performance metrics. These third parties use cookies and other technologies to help analyze

and provide us the data. By accessing and using the Website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Website Privacy Policy. For more information on these third parties, including how to opt out from certain data collection, please visit the websites below. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Website.

For Google Analytics, please visit: <https://www.google.com/analytics>

We may also use one or more third-party remarketing services (including Facebook, Twitter, and Google Adwords) to advertise on third party websites to previous visitors to our Website. It could mean that we advertise to previous visitors who haven't completed a task on our Website, for example using the contact form to make an inquiry. These third-party remarketing service providers use cookies to serve ads based on a past visit to the Website. Any data collected by such third-party remarketing service providers will be used in accordance with this Website Privacy Policy and the privacy policy of such third-party remarketing service providers. For more information on such third-party remarketing service providers, including how to opt out from certain data collection, please visit the following websites:

For Google Adwords, you can set preferences for how Google advertises to you using the [Google Ad Preferences page](#). You can also [opt out of interest-based advertising entirely by cookie settings](#) or [permanently using a browser plugin](#).

For Facebook, please visit: <http://www.facebook.com/about/privacy>

For Twitter, please visit: <https://support.twitter.com/articles/20171365>

### **Aggregate Data**

In an ongoing effort to better understand our users, the Website, and our products and services, we may analyze your information in aggregate form to operate, maintain, manage, and improve any of the foregoing. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products and services and the Website to current and prospective business partners and to other third parties for other lawful purposes.

### **Additional Uses**

We also use Contact Information and other information collected pursuant to this Website Privacy Policy to respond to general inquiries, solicit Feedback, provide relevant content on our Website, and communicate with you via e-mail regarding our current and future products, services, news, and events.

### **Onward Transfer to Third Parties**

Like many businesses, we hire other companies to perform certain business-related services. We may disclose personal information to certain types of third-party companies, but only to the extent needed to enable them to provide such services. The types of companies that may receive personal information and their functions are: hosting services, database management/back-up services, and marketing and support services, such as MailChimp. All such third parties function as our agents, performing services at our instruction and on our behalf pursuant to contracts which require they provide at least the same level of privacy protection as is required by this Website Privacy Policy and implemented by EigenRisk.

### **Business Transfer**

In the event of a merger, dissolution, or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal information, would be transferred to the surviving entity in a merger or the acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy and confidentiality of such personal information as set forth in this Website Privacy Policy.



### **Disclosures to Public Authorities**

We are required to disclose personal information in response to lawful requests by public authorities, including for the purpose of meeting national security or law enforcement requirements. We may also disclose personal information to other third parties when compelled to do so by government authorities or required by law or regulation including, but not limited to, in response to court orders and subpoenas.

### **Opt-Out for Direct Marketing Concerning Our Products and Services**

You may opt out at any time from the use of your personal information for direct marketing purposes by e-mailing the instructions to this email address: [privacy@eigenrisk.com](mailto:privacy@eigenrisk.com). Please allow us a reasonable time to process your request. We do not share your personal information with third parties for their marketing purposes.

### **How We Protect Your Information**

EigenRisk takes reasonable security measures to protect your personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in processing and the nature of such data, and comply with applicable laws and regulations. You should keep in mind, however, that no Internet transmission is 100% secure or error-free. In particular, e-mail sent to or from the Website may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail or other electronic means. Where EigenRisk has given you access credentials that enable you to access certain parts of the Website, you are responsible for keeping such access credentials confidential.

### **Links to Third-Party Sites**

The Website may, from time to time, contain links to external websites. EigenRisk encourages you to review the privacy and security policies of any externally-linked websites that may be accessed through the Website. EigenRisk assumes no responsibility or liability for the information, collection, and disclosure practices of any external websites that a user can access through the Website. Please check the privacy policies of these external websites before you submit any personal information or other information to them.

### **Access to Personal Information**

Upon request to [privacy@eigenrisk.com](mailto:privacy@eigenrisk.com), we will provide you with confirmation as to whether we are processing your personal information, and have the data communicated to you within a reasonable time. You have the right to correct, amend, or delete your personal information where it is inaccurate or has been processed in violation of this Website Privacy Policy. We may require payment of a non-excessive fee to defray our expenses in this regard. Please allow us a reasonable time to respond to your inquiries and requests.

### **Your Choices**

Should you choose to unsubscribe from any mailing lists for which you registered, you may do so by following the instructions on how to unsubscribe provided in all EigenRisk communications.

### **Retention of Personal Information**

We will retain your personal information in a form that identifies you only for as long as it serves the purposes for which it was initially collected as stated in this Website Privacy Policy, or subsequently authorized. We may continue processing your personal information for longer periods, but only for the time and to the extent such processing reasonably serves the purposes of archiving in the public interest, journalism, literature and art, scientific or historical research, and statistical analysis, and subject to the protections of this Website Privacy Policy. After such time periods have expired, we may either delete your personal information or retain it in a form such that it does not identify you personally.

### **Important Notice to All Non-U.S. Residents**



Your information may be stored and processed in the United States or any other country in which EigenRisk or our parent, subsidiaries, affiliates, or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from United States law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the United States or any other country in which we or our parent, subsidiaries, affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this Website Privacy Policy.

### **California Privacy Rights**

EigenRisk does not monitor, recognize or honor any opt-out or do not track mechanisms including general web browser, “Do Not Track” settings and/or signals.

### **About Children**

EigenRisk does not knowingly collect personal information from children under the age of 13 through the Website. If you are under the age of 13, please do not provide any personal information through the Website. If you have reason to believe that a child under the age of 13 has provided personal information to EigenRisk through the Website, please contact us using the information in the Contact Us section below, and we will endeavor to delete that personal information from our databases.

### **Changes to this Website Privacy Policy**

This Website Privacy Policy is effective as of the date stated at the top of this Website Privacy Policy. We may change this Website Privacy Policy from time to time, and will post any changes on the Website as soon as they go into effect. By accessing the Website after we make any such changes to this Website Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Website Privacy Policy on a regular basis.

### **Contact us**

If you have any questions about this Website Privacy Policy or to report a privacy issue, please contact us in one of the following ways:

Email: [privacy@eigenrisk.com](mailto:privacy@eigenrisk.com)

Or write to us at:

EigenRisk, Inc.  
Attention: Privacy Policy  
PO Box 320126  
Fairfield, CT 06825

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