

Bear Analytics, Inc. Privacy Policy

Introduction

Bear Analytics, Inc. (the “Company,” “Bear Analytics,” “we” or “us”) is a corporation with offices in Arlington Virginia, United States. Bear Analytics may process and/or collect Customer Data (defined below) from its customers (“you”) and/or its or their users around the world and processes and store that Data within the United States. This Privacy Policy reflects Bear Analytics commitment to privacy and data protection. By access or using any product or service from Bear Analytics, providing data to Bear Analytics, or checking the “I consent to the Privacy Policy” box you consent to the collection, use and disclosure practices identified in this Privacy Policy and represent and warrant that you have the right to provide Bear Analytics the data you provide to us for processing and storage as contemplated in this Privacy Policy, our General Terms of Use, or any other applicable agreement you may have with Bear Analytics. Capitalized terms not defined in this Privacy Policy have the meaning given in our General Terms of Use.

This Privacy Statement describes how Bear Analytics processes Customer Data from sources such as Virtual Event Providers (also referred to as VEPs), Event Organizers, Registration Companies, and/or you and other sources; how that Customer Data may be analyzed, aggregated and used (e.g., via the Bear IQ Platform (the “Platform”) or other applicable Service we provide; and how customers or other subscribers to a Bear Analytics Service and/or individuals associated with them (collectively “Users”) may interact with the Customer Data.

“Customer Data” means the content or information which is provided to the Bear Analytics Platform and/or any other Services. “Personal Data,” is Customer Data that is specifically associated with an identified or identifiable natural person and is protected as personal data or personal information under applicable data protection law. Personal Data only includes data that is regulated as such under applicable laws and regulations.

Bear Analytics is a Data Processor/Service Provider for its Customers

Bear Analytics customers (typically, VEPs, Event Organizers, or Registration Companies), and not Bear Analytics, determine when, how and why Customer Data and Personal Data is submitted to the Platform and/or Services, and are solely responsible for providing notices to and/or obtaining any consents from individual data subjects and/or other third parties.

With respect to such Personal Data and as applicable to Bear Analytics’ business and Services, (1) Bear Analytics is a “data processor” (“Data Processor”) and/or a “service provider” under applicable laws and regulations, and (2) Bear Analytics’ corporate customers are the controllers under applicable laws and regulations (“Data Controller”).

By directly or indirectly providing Personal Data to the Platform and/or any Services, you authorize Bear Analytics to process such Personal Data pursuant to Bear Analytics’ Services and related Documentation and this Privacy Policy.

Categories of Personal Data Processed

Bear Analytics processes data collected by VEP and other customers and companies in support of its primary focus of client success. Bear Analytics may obtain and processes data about individuals through Virtual Event Providers and their partners. Information we may process and store may include:

Contact information: Name, employer, title, email address, physical address, phone number, and similar contact info, usernames and passwords.

Demographic Information: Employment status, occupation, location, region, gender, and age

Digital Fingerprinting: In general, digital fingerprinting technologies assign a unique identifier to a user's computer to identify and track the computer's survey activity.

Transaction and registration information: Information which is generated in the course of a transaction (e.g., with the Virtual Event Provider), including account information, logins, passwords, purchase history, product registration information, product interest information, transaction information, and in some cases, student verification information. We may also collect registration information related to travel preferences, scheduling information, food preferences or allergies, and accessibility requests.

Through interactions with Bear Analytics, Virtual Event Providers, or other customers, contractors, or partners, individuals must consent to their privacy policies related to the collection of personal information and Bear Analytics' policies, as and if required by law or regulations.

We implement reasonable and customary practices designed to protect information provided to us as described in this policy, plus any additional restrictions imposed by the source of the data which Bear Analytics expressly agrees to in writing.

Note Regarding Sensitive Personal Data

If Virtual Event Providers and/or their partners elect to collect a subset of personal information revealing financial or payment information, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, health information, biometric data, information relating to sex life or sexual orientation, or other similarly sensitive data, then such information shall not be provided to Bear Analytics unless otherwise agreed in writing by Bear Analytics, and such information may be anonymized, isolated, or deleted by us.

OUR USE OF COLLECTED INFORMATION

We may use the Personal Data to provide the Bear Analytics' Platform and/or other Services pursuant to our Terms of Use and other applicable agreements.

In general, we use the information primarily to:

- Create statistical and analytical industry benchmarks for market research (See *Creation of De-Identified Data for Industry Benchmarks and Market Research* below);

- Provide and deliver products or services, including software updates;
- Operate and improve our operations, systems, products, and services;
- Understand preferences to enhance experiences;
- Respond to comments and questions and provide customer service;
- Provide service and support, such as sending confirmations, invoices, technical notices, updates, security alerts, and administrative messages and providing customer support and troubleshooting;
- Communicate about promotions, upcoming events, and news about products and services offered by Bear Analytics and our selected partners;
- Link or combine information about an individual with other personal information we get from third parties, including to help understand your needs and provide you with better and more personalized service;
- Enforce our terms and conditions or protect our business, partners, or users;
- Protect against, investigate, and deter fraudulent, unauthorized, or illegal activity; and
- Keep our products, facilities, and services secure.

Creation of De-Identified Data for Industry Benchmarks and Market Research

We may create de-identified data records sourced or extracted from data connected to or associated with personal information by excluding information (such as individual names) that makes the data personally identifiable. We use this de-identified data to analyze request and usage patterns so that we may enhance the content of our Platform and Services and improve our Platform and Services. We also use this data to create industry benchmarks to better understand the global event climate, and provide this benefit to our customers as well. We reserve the right to use de-identified data for any purpose and disclose de-identified data to third parties in our sole discretion where permitted by applicable law.

Profiling

When you interact with our Platform or Services (such as a request for us to contact you, creation of an Account, request for information on pricing, or downloading content), we may collect personal information and analyze that information to build individual profiles. We use third-party tools to help us make the profile by providing information about the User's business (like, company size and industry, for example). These profiles will be used to help us predict future interest in our Platform or Services. We base our profiling on activities relating to the Platform or Services, and we may update profiles in real-time.

Sharing of Personal Data

Bear Analytics uses reasonable and appropriate measures designed to keep personal information confidential and secure. Bear Analytics does not sell, rent, or lease Personal Data. In some circumstances, Bear Analytics may share metrics and information derived from Personal Data with third parties with your consent, for example:

- **Analytics:** We may create, use and share aggregated or anonymized data for any lawful purpose, such as analytics or system benchmarks or research purposes as permitted by law.
- **Lead Lists:** If you and your customers or users opt-in to allowing your customers' customers (e.g., exhibitors and sponsors of specific events) to access their post-show reports and lead-lists, we will furnish them this data via the Bear IQ Service. Data could include event performance averages and/or individual contact information such as email address, name, job title, and company for attendees at the event that interacted with the exhibitor/sponsor company.
- **Subsidiaries and Acquisitions:** We may share Customer Data and Personal Data with our corporate subsidiaries and divisions (e.g., affiliates, parent company, sister companies, joint ventures, or other companies under common control). If another company or entity acquires us or any Bear Analytics subsidiary, division, solutions, or our assets, we may also share your personal information with that company or entity.
- **Third-Party Service Providers:** With third parties who work on our behalf for the purposes described in this Privacy Policy or any agreement we have with you, provided that such third parties agree to comply with reasonable and customary privacy and data protection measures generally consistent with this Privacy Policy. These services may include providing cloud computing infrastructure, website crash reporting, and providing customer support or account administration.
- **Lawful Requests:** To comply with laws or to respond to lawful requests and legal process, provided that Bear Analytics will endeavor to notify you, where practical and permitted by applicable law or regulation, if Bear Analytics has received a lawful request for your information.
- **Protection of Rights and Property:** To protect the rights and property of Bear Analytics, our agents, customers, and others, including to enforce our agreements and policies.
- **Emergency:** In an emergency, including to protect the personal safety of any person.

CALIFORNIA PRIVACY RIGHTS

If Personal Data is relating to a California resident and the processing of personal information relating to that Personal Data is subject to the California Consumer Privacy Act ("CCPA"), then we will reasonably assist you in complying with any CCPA obligations by providing the following upon request relating to that Personal Data:

1. The categories and specific pieces of such personal information we have collected relating thereto;
2. The categories of sources from which we collected such personal information;
3. The purposes for collecting, using, or selling such personal information;
4. The categories of third parties with which we share such personal information;

To make such requests, contact us at privacy@bearanalytics.com, or the other contact information set out below. We do not "sell" personal information as defined by the CCPA.

You also have a right to request that we delete personal information under certain circumstances, subject to several exceptions. Finally, you have a right not to be discriminated against for exercising rights set out in the CCPA.

Currently, Bear Analytics does not meet the threshold to be required to comply with the CCPA, but some of our customers may meet such threshold. We will reasonably assist applicable customers in meeting these requirements in connection with data we process for them.

INTERNATIONAL PERSONAL DATA

Please note that our Services are directed toward the United States and all data is stored in the United States. By using our Services, you consent to the collection, storage, processing, and transfer of Personal Data in and to the United States, or other countries and territories, pursuant to the laws of the United States, and have obtained any required consents from applicable data subjects.

PERSONAL INFORMATION SECURITY

Bear Analytics maintains appropriate and reasonable administrative, technical, and physical safeguards designed to help protect Customer Data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. However, no transmission over the internet is 100% secure. We encourage you to protect your usernames and passwords to help prevent anyone from accessing or abusing your account(s), including not using the same passwords for our Services that you use with other accounts. If you have any questions about the security of Personal Data, you can contact us at privacy@bearanalytics.com.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Services or our website. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Services. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Services after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

Contacting Us

If you have any questions about this Privacy Policy, please contact us at security@bearanalytics.com, or by post at:

Bear Analytics, Inc.
Email: security@bearanalytics.com
Attention: Privacy

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