# **CIC Privacy Policy**

This privacy policy (the "Policy") describes how CIC gathers, uses, shares and protects personal information. This Policy applies on the one hand to CIC and its current and future affiliates (collectively, "CIC," "we," and "us") and on the other hand to CIC clients and their members and employees, prospective CIC clients and their members and employees, and visitors to CIC's premises, websites, applications and other online services (individually and collectively, "you"). By clicking "I agree," you are committing yourself to be bound by this Policy, including any updates and revisions as described below. If you do not agree with this Policy, your sole recourse is to cease your use of CIC services.

# **Summary**

Information We Collect	We may collect personal information and device information based upon your application for and use of our services. We may use cookies and similar tracking technologies to collect such information. We also may collect personal information from third parties, including other parties applying for or using our services.
How We Use Your Information	We may use your information to provide services, operate and market our business, comply with applicable law, and otherwise as permitted by applicable law.
How We Share Your Information	We may share your information with third parties to provide services, operate and market our business, comply with applicable law, and otherwise as permitted by applicable law.
Security of Your Information	We maintain commercially reasonable technical, administrative, and physical security measures designed to protect your information.
Your Choices	You can opt out of receiving marketing communications from us, from being listed in the CIC Member Directory, and/or from certain sharing of your information with third parties.

Accessing and Correcting Your Information	We will provide you with an opportunity to access, update or correct your information upon request in accordance with applicable law.
International Transfers	We may transfer your information outside of your home country.  Any such international transfers will be made in accordance with applicable law.
Links to Other Websites and Applications	Our websites, applications and directories may contain links to other websites and applications that are not owned or controlled by CIC. CIC is not responsible for those websites and applications, which may have privacy policies of their own.
Changes to This Policy	We will notify you of material changes to this Policy via posting on CIC's websites and applications.
Contact Information	If you have questions about this Policy, please contact helpmeportal@cic.com
Jurisdiction-Specific Notices	Residents of certain jurisdictions may have additional rights, as explained below.

# **Information We Collect**

CIC may collect information concerning you, your devices and your use of CIC services. This includes the following categories of information:

- Data you provide to CIC directly, including in license applications, applications to use the CIC Member Portal, and your CIC Member Directory listing if you choose to submit a listing.
   Examples of such information may include your name, telephone number, email address and employer. If you are responsible for license payments to CIC, we also may maintain financial information about you such as your bank account or credit card numbers.
- Data about your use of CIC's websites and applications, including information about your devices and your use of these services including through cookies and other tracking

technologies. Examples of this information include browser type and operating system, IP address, time spent on CIC's websites and Member Portal application.

- Information about your use of other CIC services. Examples of such information include conference room reservations and your communications with CIC team members.
- Information that other members of the CIC community provide to CIC about you. Examples may include your name, title and contact information for you in your company's application for CIC services or its CIC Member Directory listing. To the extent that any member of the CIC community discloses personal information about another individual to CIC, we assume that the disclosing member has secured the consent of the other individual for that disclosure and processing in accordance with this Privacy Policy. If you are applying or registering for CIC services or submitting a CIC Member Directory listing, you must secure the consent of any individuals whose information you provide to CIC.
- **Information from third parties.** This may include credit reports and information from other publicly and commercially available sources.

#### **How We Use Your Information**

We may use your information for any of the following purposes:

- To provide you and other members of the CIC community with services and to manage our performance of those services;
- To publish the CIC Member Directory in accordance with the CIC Member Portal Terms of Service Policy;
- To respond to inquiries we receive from you and to deliver you notifications and other operational communications;
- To administer our websites and applications and to analyze how users navigate and use our services and individual features;
- To send you statements and invoices and to collect payments from you as applicable;
- To send you marketing and other communications. For example, we may contact you with periodic updates about CIC, to provide information we think may be of interest to you, to conduct surveys and otherwise promote our services;
- To protect, enforce or defend legal rights, privacy, safety or property, whether our own or that
  of other members of the CIC community and to enforce compliance with license agreements
  and other CIC policies;
- To comply with applicable law; and

• As otherwise consented to you or permitted by applicable law.

We will retain your information for the period necessary to fulfill the purposes listed above and as otherwise needed to comply with applicable law and internal CIC policies.

#### **How We Share Your Information**

We may disclose your personal information in the following circumstances to the following parties:

- CIC Affiliates. We may disclose information to any CIC affiliate for the purposes listed above.
- CIC Community Members. Your name, professional background, contact information and other information may appear in the CIC Member Directory in accordance with the CIC Member Portal Terms of Service Policy
- Service Providers. We may rely on service providers to process payments, perform functions on our behalf or help us improve our services through data analytics or otherwise. We do not authorize these service providers to use your information for purposes other than for which it has been provided, and do not authorize these service providers to disclose that information to unauthorized parties. We require these service providers to maintain appropriate security measures.
- Other Parties When Required by Law or to Protect CIC and CIC Community Members. We may
  disclose your information to law enforcement, regulatory, court other entities where we believe
  that doing so would be in accordance with or permitted by any applicable law, regulation or
  legal process, to defend the interests, personal safety, rights and property of CIC and its
  community members, or to respond to emergencies.
- Other Parties in Connection with Actual or Potential Transactions. We may disclose your
  information to a third party in connection with an actual or potential sale or transfer of all or a
  portion of our business or during negotiation of any merger, financing, acquisition, bankruptcy,
  dissolution, transaction or proceeding.
- Other Parties Subject to Your Consent or Direction.

We also may share aggregated or de-identified information with third parties in our discretion.

### **Security of Your Information**

CIC will take reasonable technical, administrative and physical security measures to help prevent the loss, misuse or alteration of your personal information. However, CIC cannot and does not guarantee that your personal information will remain secure.

#### **Your Choices**

You can opt out of receiving marketing communications from us, from being listed in the CIC Member Directory, and/or from certain sharing of your information with third parties.

### **Accessing and Correcting Your Information**

you may have the right to access your personal information and to update or correct inaccuracies in your personal information. Please contact helpmeportal@cic.com if you would like to access and update or correct your personal information.

### **International Transfers**

Information that CIC collects may be stored and processed in and transferred between any of the countries in which CIC operates to enable the use of information in accordance with this Policy. Please note that any personal information submitted for publication in the CIC Member Directory may be available around the world. By clicking "I agree," you are agreeing to such cross-border transfers of personal information.

# **Links to Other Websites and Applications**

Our websites, applications and directories may contain links to other websites and applications that are not owned or controlled by CIC, including links to CIC licensees, advertisers, sponsors and partners. CIC does not endorse or assume any responsibility for linked services and is not responsible for such linked websites and applications, which may have privacy policies of their own.

# **Changes to this Policy**

CIC may update this Policy by posting a new version on its websites and the CIC Member Portal. You should periodically review this Policy and CIC may, in its discretion, notify you by e-mail or other direct communication.

#### **Contact Information**

If you have questions or concerns about this Policy, or wish to exercise any of your rights under the Policy or applicable law, please contact helpmeportal@cic.com.

# **Jurisdiction-Specific Notices**

- California Residents: You may opt out of having your information shared with third parties for those third parties' direct marketing purposes by contacting us as provided in the "Contact Information" section above.
- **Europe and UK Residents**: You may have the to request deletion, rectification or blocking of your personal information or to object to the processing of your information. You shall have the right to receive your personal information in a structured, commonly used and machine-readable format and you have the right to transmit such personal information to another controller. If you wish to exercise your rights, please contact us as detailed in the

"Contact Information" section above. You also have the right to object to the processing of your personal information for purposes of advertising as well as market and opinion research, and you have the right to revoke a consent given by you at any time with effect for the future. Furthermore you have the right to lodge a complaint with the local supervisory privacy authority. If you wish to exercise these rights, please contact us as provided in the "Contact Information" section above.