Civian Privacy Policy

Last Updated: September 15, 2022

Welcome!

Welcome to https://www.Civian.io/ (the "Website"). "Civian" is the software division of Ichor Strategies, LLC and its affiliates, representatives, successors, and assigns (collectively, "Ichor Strategies" and/or ""). We care about your privacy and the Personal Information (defined below) you share with us.

This Privacy Policy describes the Personal Information we collect from you and how it may be stored and processed in the United States. Our goal is to help explain why we are using and how we are protecting the Personal Information we collect about you, as well as how you can exercise your privacy rights. We recommend that you read this Privacy Policy in full to ensure you are completely informed about using Civian' Website or Services (described below), or submitting any personal or financial information through Civian' Website, or in using Civian' Software.

Please note, this Privacy Policy does not apply to websites, applications, or services that display or link to third-party websites with other privacy statements.

If you have any questions about our Privacy Policy, our practices, or how we use your Personal Information, please contact us at at info@civian.io

1. About Us

This Website is operated by Ichor Strategies, LLC, a limited liability company with its principal place of business in the State of New York in the United States ("Ichor Strategies", "Civian", "us", "we", or "our"). For more information about Civian, please visit our About page here.

2. Key Terms

In this Privacy Policy, these terms have the following meanings:

"Website" or "Websites" means any website we own and operate (such as https://civian.io/ or any web pages, interactive features, or other online offerings.

"Users," "User," "you," or "your" means any person who schedules our Services or makes a purchase through our Website, signs up to receive emails or other communications from Civian, or uses our Website for any other reason. This also includes your respective representatives, successors, and assigns.

"Services" includes any products or services provided through our Website and offline products and services.

"Personal Information" means any Personal Information that identifies or can be used to identify a User to identify a User, directly or indirectly.

3. Personal Information that We Collect.

(A) Personal Information Collected That You Provide Us

When you participate in the Services through our Website we ask you to provide Personal Information. The Personal Information we collect from you is only what we need to be able to provide you with the Services effectively. This Personal Information may include:

Your name;

Your business or company name and title;

Your email address;

Your home or other personal location address;

Your billing address;

Your phone number;

Any communications related to your use of the Website or Services.

You may choose to provide additional Personal Information when you communicate with us through our Website or otherwise interact with us, and we will keep copies of those communications for our records. Your decision to allow us to collect this Personal Information from you is voluntary, however if you choose not to provide this information, some or all of the Services may be unavailable to you.

(B) Personal Information Automatically Collected

In addition to Personal Information that you choose to provide to us, when you visit our Website, we may also collect certain information automatically from your personal computer, laptop, tablet, mobile phone, or other devices. In some countries, including those countries in the European Union, this information may be considered Personal Information under applicable information protection laws.

Specifically, the Personal Information we collect automatically may include the following:

Your IP address or other unique identifier;

Your computer hardware model and operating system information;

Your Internet browser identification:

Your Internet browsing activity;

Your general geographic location;

Your interaction and activities with our Website, including remembering you and your preferences;

Your mobile device used to access our Services, including the hardware model, operating system, unique device identifiers, and network and data information; and Other certain information related to your devices, including the time of day you visit our Website, among other information.

We may use various methods and technologies to automatically collect or store this Personal Information through tracking tools like browser cookies, web beacons, pixels, embedded scripts, and eTags or entity tags. We do this on our Website and in emails we send to you.

(C) Information Security and Disclaimer

Civian takes reasonable security measures to help safeguard your Personal Information from loss, theft, misuse and unauthorized access, use, disclosure, alteration and destruction. However, please keep in mind

that no method of transmission over the Internet or through mobile applications is 100% safe. Therefore, we cannot guarantee complete and absolute security of your Personal Information. Unauthorized access, use, disclosure, alteration, and destruction, in addition to hardware or software failure, and other factors, may compromise the security of your Personal Information at any time.

Consequently, we cannot guarantee or warrant the security of any information you transmit to us from security breaches, identity theft, or events that could cause loss of your data or information. We shall not be held liable for any damages or injury caused by the disclosure of your Personal Information, whether caused by security breach, accident, inadvertence or any other act resulting in disclosure. Therefore, any transmission of Personal Information through our Website is at your own risk. If you are at all uncomfortable with our security measures, please do not submit information to us through the Website. We are also not responsible for your or a third party's circumvention of any privacy settings or security measures. Your own efforts to protect against unauthorized access play an important role in protecting the security of your Personal Information. For example, you should be sure to sign off when you finish using a shared computer, not transmit your Personal Information while on a public Wi-Fi network, and always log out of any site when viewing Personal Information. Please note, we are not security professionals and therefore recommend speaking to a security professional if you have any questions about your own efforts to protect your Personal Information.

4. We Combine Collected Personal Information

We combine Personal Information that we have collected offline with Personal Information we collect online, such as our Website. We also combine Personal Information that we have collected across other third-party websites, your devices, (such as computers and mobile devices), and from third parties with Personal Information we already have.

5. Cookies and Similar Tracking Devices

Because we employ cookies and similar tracking tools, we wanted to provide you with some additional information on how it all works.

A cookie is a piece of information, which may include a unique identifier, that is sent to your Internet browser from a server and stored on your hard drive or device. We assign a different cookie to each device that accesses our Website. Cookies allow your devices to use all the features on our Website, such as remembering who you are, knowing if you have visited our site before or if you are a first-time visitor, and remembering your address and contact information. Cookies contain no information about you or any computer or device you are using.

You are always free to decline our cookies and you may be able to set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our Website may then be inaccessible or not function properly.

We may also use Google Analytics to collect demographic and interest data about you (such as age, gender, and interests), including through Google Analytics Demographics and Interest Reporting. We may

use the information collected about you through Google Analytics for Google services such as Remarketing with Google Analytics; Google Display Network Impression Reporting; User-ID; and integrated services that require Google Analytics to collect data for advertising purposes, including the collection of data via advertising cookies and identifiers.

Information may be collected through Google Analytics, LinkedIn, Facebook, and Instagram, to customize content and advertising by analyzing traffic to the site and/or page. You can find out more about Google Analytics and how to opt-out by going here and using this opt-out form. You can find out more about LinkedIn and how to opt-out by going here, for Facebook here, and for Instagram here. Choices you make are browser and device specific. Some aspects of our site use cookies to function. You may not be able to use these features if you set your device to block cookies.

6. How We Use Your Personal Information:

We may use your Personal Information for various purposes, including, but not limited to, the following:

Improving the effectiveness of our Website, marketing endeavors, and Services;

Detect, investigate, and prevent fraudulent transactions and other illegal or unauthorized activities and protect the rights and property of Civian and our Users; Providing customer service; Notifying you of any information concerning the Services;

Sending you newsletters and other communications that you can opt-out of;

Sending you direct mail offerings;

Sending you email communications about our Services, promotions, events, or other important information that you opt-into;

Sending you email communications about content you included on our Website; Sending you technical notices, updates, security alerts, and support messages; Enabling you to participate in the Website's features:

Identifying your Services preferences and informing you of new or additional products, services, and promotions that may be of interest to you;

For internal business purposes such as trainings and business development;

Notifying you about important changes to our Website; and

For purposes disclosed at the time you provide your information or as otherwise discussed in this Privacy Policy.

If you do not want to receive email notifications from us, please unsubscribe by using the link on the email communication or contact us at Civian at info@civian.io

7. Sharing Your Personal Information with Third Parties

Like many businesses, the Personal Information we collect may be shared with third parties to enable us to provide our Services to you. We may hire other companies to perform certain business-related functions on our behalf, and we may provide access to or share your information with these companies so they can perform services for us. Examples of such functions include marketing, mailing information, data storage, security, fraud prevention, payment processing, legal services, accounting services, and maintaining databases.

By providing these third-party companies your Personal Information, they are not permitted to use, share, or sell said information; however, they have their own privacy policies with respect to the information we share with them to provide our Services. This includes how they may process and store your Personal Information.

We may also disclose your Personal Information to third parties for the following reasons:

To comply with any court order, law, or legal process, including to respond to any government or regulatory request;

To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes; or

If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Civian, our Users, or others.

In general, these third-party companies will only collect, use and disclose your Personal Information to the extent necessary to allow them to perform the services they provide to us; however, once you leave our Website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy. Therefore, we recommend that you read any third-party company's privacy policies so you can understand the manner in which they will handle your Personal Information.

We are not responsible for, and cannot guarantee or warrant, the privacy and security practices and policies, or use of cookies of third-party companies or any other websites that are linked to or from the Website. We shall not be held liable for any damages or injury caused by the disclosure of your Personal Information by these third-party companies. Therefore, any transmission of Personal Information through our Website is at your own risk. If you are at all uncomfortable with your Personal Information being shared with third parties, please stop using the Website immediately.

8. Your Consent

By using our Website, you consent to the collection and use of your Personal Information by us as described in our Privacy Policy. If we decide to change our Privacy Policy, we will post a link to those changes on this page, so you are always aware of what information we collect, how we use it, and under what circumstances we may disclose it. We reserve the right, in our sole and absolute discretion, to notify you of material changes to our Privacy Policy by email using the email address you provide us. Your continued use of our Website after we make changes indicates your acceptance of those changes, so please check this Privacy Policy periodically for updates.

9. Options to Manage Personal Data

You may update, correct, or delete certain Personal Information retained by Civian at any time by contacting us at info@civian.io

We may decline requests that are prohibited by law, that could adversely affect the privacy or other rights of another person, where we are unable to authenticate you as the person to whom the Personal Information relates, or that are not required to be honored by applicable law.

10. Minors and COPPA Compliance

The Services provided through our Website are only available for adults 18 or older. If you are under 18, you may use our Website only through a parent or guardian. In cases where you - a parent or guardian - have authorized a minor under 18 to use our Website, you recognize that you are fully responsible for: (i) the online conduct of such minor; (ii) controlling the minor's access to and use of our Website; and (iii) the consequences of any misuse by the minor. You acknowledge that we have no obligation to monitor the content accessible on or through our Website.

Children under 13 years of age are prohibited from using the Services and the Website. No one under age 13 may provide any information to or on the Website. We do not knowingly collect Personal Information from children under 13, even with verified parental or guardian consent. If you are under 13, you are prohibited from providing us with any Personal Information about yourself, including your name, address, telephone number, email address, or any screen name or User name you may use.

If we learn we have collected or received Personal Information from a child under 13, we will delete that information in accordance with the Children's Online Privacy Protection Act ("COPPA"). If you believe we might have any information from or about a child under 13, please contact us at Civian at [info@civian.io], and we will take reasonable steps to ensure that such information is deleted from our records.

11. Personal Information Retention

We retain your Personal Information as long as it is commercially reasonable to provide you with our Services, comply with any applicable laws, resolve disputes, and enforce any of our agreements, or the other purposes described in this Privacy Policy. We may retain your Personal Information for longer periods if we have obtained your consent to use or retain your Personal Information for another or similar purpose. We may also retain your Personal Information for any such period as may be required by applicable law.

Because these needs can vary for different Personal Information types in the context of different products, actual retention periods can vary based on criteria such as user expectations or consent, the sensitivity of the information, the availability of automated controls that enable users to delete information, and our legal or contractual obligations. If you have any questions concerning our retention of your Personal Information, please contact Civian at [info@civian.io].

12. Updating Your Information and Choices

You may update or correct information about yourself by contacting us at Civian at [info@civian.io]. You may opt out of receiving promotional mail, emails, or other forms of communication from us by unsubscribing using the link on the email communication or by contacting us at Civian at [info@civian.io]. Please be sure to include your current information and the requested changes you would like us to make to your marketing profile in your communication.

Please note, we may still send you certain communications relating to your use of our Website, such as administrative and service announcements, security notifications, and Privacy Policy updates, and these communications may be unaffected if you choose to opt-out from receiving our marketing communications.

13. Applicable Law

The Privacy Policy will be governed by and constructed in accordance with the laws of the State of New York in the United States, without regard to its conflicts of law provisions.

14. Your California Privacy Rights [California Users Only]

As discussed in this Privacy Policy, we may from time to time elect to share your Personal Information with third parties for those third parties' direct marketing purposes. Under California Civil Code § 1798.83, California residents are entitled to ask us for a notice describing what categories of Personal Information we share with third parties for their direct marketing purposes. That notice will identify the categories of Personal Information shared with third parties and used for direct marketing purposes and the name and address of the third parties that received such Personal Information. If you are a California resident and would like a copy of this notice, please submit a written request to the following address (limit one request per year): Civian at [info@civian.io]. You must include your full name, email address, and postal address in your request. Please allow thirty (30) days for us to respond.

15. Know Your Rights Under the General Data Protection Regulation (GDPR) [European Union Users Only]

Under the new law effective May 25, 2018, unless subject to an exemption under the GDPR, you have the following rights with respect to your Personal Information:

The right to request a copy of the Personal Information we hold about you;

The right to request that we correct any Personal Information if it is found to be inaccurate or out of date;

The right to request your Personal Information be erased where it is no longer necessary for us to retain such information:

The right to withdraw your consent to the processing of your Personal Information at any time; The right to request we provide you with your Personal Information and where possible, to transmit that information directly to another information controller, (known as the right to information portability), where applicable;

The right, where there is a dispute in relation to the accuracy or processing of your Personal Information, to request a restriction on further processing;

The right to object to the processing of Personal Information. Please note, this only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority), direct marketing, and processing for the purposes of scientific/historical research and statistics;

The right to lodge a complaint with authorities; and

The right to transfer your Personal Information abroad. Please note, if your Personal Information is to be transferred to countries or territories outside the European Union, you must include details of how the information will be protected.

If we wish to use or process your Personal Information for a purpose not covered by this Privacy Policy, we will provide you with a new notice explaining this use prior to commencing the processing and setting out the relevant purposes and processing conditions. Wherever and whenever necessary, we will seek your consent prior to any new use or processing.

16. Questions or Comments Regarding this Policy.

We value your comments and opinions. If you would like to act on any of the rights discussed above, please contact us at Civian at info@civian.io