

## **PLATFORM PRIVACY POLICY**

**Last Updated: October 19, 2018**

This privacy policy (the “**Platform Privacy Policy**”) relates to the information collection and use practices of BaseCap Analytics Inc. (“**BaseCap**,” “**we**,” “**us**,” or “**our**”) in connection with your access to, and usage of our proprietary platform (“**Platform**”), which is made available to you through Azure Marketplace.

### **Description of Users and Acceptance of Terms**

This Platform Privacy Policy applies to employees, contractors, or agents of our customer whom the customer authorizes to access and use the Platform (“**Authorized Users**”).

By accessing and using the Platform, Authorized Users are agreeing to the terms of this Platform Privacy Policy.

### **The Information We Collect and/or Receive**

In the course of operating the Platform, BaseCap will collect (and/or receive) the following types of information. You authorize us to collect and/or receive such information.

#### 1. Contact Information

When you create a user account on the Platform as an Authorized User, you will be asked to provide certain information which may include first name, last name, and e-mail (“Contact Information”). The Contact Information is used to provide our Platform and to contact you for purposes of direct marketing of our current and future products and services.

#### 2. Customer Data

In using the Platform, Authorized Users may provide us with Customer Data. For purposes of this Platform Privacy Policy, Customer Data means any data and materials that the Authorized Users make available and process through the Platform. We use the Customer Data in accordance with the terms and conditions of this Platform Privacy Policy.

#### 3. Other Information

In addition to the Contact Information, and Customer Data, we may collect and/or receive additional information (collectively, the “**Other Information**”). Such Other Information may include:

- a. From Your Activity. Information that we automatically collect when you use the Platform, such as your 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 Platform you visit, and similar information concerning your use of the Platform.
- b. From Cookies. Information that we collect using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s hard drive so that your computer will “remember” information about your visit. We use cookies to help us collect Other Information and to enhance your experience using the Platform. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser’s documentation for information on how to do this. However, if you decide not to accept cookies from us, the Platform may not function properly.

### **How We Use and Share the Information**

You authorize us to use the Contact Information, Customer Data, and the Other Information (collectively, the “**Information**”) to provide you the Platform; solicit your feedback; inform you about our products and services; and to improve our products and services.

You also authorize us to use and/or share the Information as described below.

- We may engage other companies and individuals to perform certain business-related functions on our behalf. Examples may include providing technical assistance, order fulfillment, customer service, and marketing assistance. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law. We may also share your Information with any of our parent companies, subsidiaries, or other companies under common control with us.
- In an ongoing effort to better understand our users and our Platform, we might analyze the Information in aggregate form in order to operate, maintain, manage, and improve the Platform. 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 Platform to current and prospective business partners and to other third parties for other lawful purposes.
- As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.

- To the extent permitted by law, we may also disclose the Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of BaseCap or others.

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

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such Information, nor can we guarantee that the Information you supply will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

### **Accessing and Modifying Personal Information and Communication Preferences**

Authorized Users may access, review, and make changes to their personal information by logging in to their account. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any BaseCap marketing email. Authorized Users cannot opt out of receiving transactional e-mails related to their account. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

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

The Platform is operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us maybe transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the Platform, you do so at your own risk.

### **Minors**

We do not knowingly collect personal information from persons under the age of 18 through our Platform. If you are under 18, please do not give us any personal information. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Platform Privacy Policy by instructing their children to never provide personal information without their permission. If you have reason to believe that a child under the age of 18 has provided personal information to us, please contact us, and we will endeavor to delete that information from our databases.

### **External Websites**

The Platform may contain links to third-party websites (“**External Sites**”). BaseCap has no control over the privacy practices or the content of any such External Sites. As such, we are not responsible for the content or the privacy policies of such External Sites. You should check the applicable third-party privacy policy and terms of use when visiting any such External Sites.

### **Do Not Track**

BaseCap 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.

### **Changes to This Platform Privacy Policy**

This Platform Privacy Policy is effective as of the date stated at the top of this Platform Privacy Policy. We may change this Platform Privacy Policy from time to time with or without notice to you. By accessing the Platform after we make any such changes to this Platform Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Platform Privacy Policy on a regular basis.

### **How to Contact Us**

If you have questions about this Platform Privacy Policy, please e-mail us at [support@basecapanalytics.com](mailto:support@basecapanalytics.com) with “Privacy Policy” in the subject line.