



## **MarketCulture.com**

### **Privacy Policy**

**Last Updated 5/1/20**

#### **General**

MarketCulture Strategies, Inc. (“MarketCulture Strategies”) is committed to respecting the privacy of its customers, visitors and other users of the MarketCulture websites. This privacy policy is provided to demonstrate our commitment to fair information practices and the protection of your privacy. We respect your right to privacy and take your privacy seriously. Our privacy policies are strict and we are diligent in keeping your personal and financial information secure. Accordingly, this privacy policy is to inform you about our data gathering and dissemination practices for this website.

#### **Collection of your Personal Information**

Most pages on this website can be visited without providing any information about you or your company. Exceptions may occur in order to provide requested services. This privacy policy details those exceptions. Please make sure to read this privacy policy in full.

#### **Terms and Conditions**

- This privacy policy covers our treatment of personally identifiable information that we may collect when you are on our site, and when you use our services.
- We commit to hold all information you provide to us in complete privacy, except as otherwise specifically disclosed in this privacy policy.
- We do not sell or rent your name or personal information to any third party without your express permission.
- We do not sell or rent our mailing list.
- Your information is only accessed by authorized employees.

All employees are required to adhere to our strict privacy policies and any employee who violates the privacy policy is subject disciplinary measures up to and including termination of employment.



### **Information Collected**

As of the date of this privacy policy, MarketCulture Strategies collects only contact information from users of this website, such as name, email address, mailing address and telephone number. At this time, MarketCulture Strategies does not collect financial information regarding users or customers through this website.

### **Choice/Opt-out**

You have a choice about how we use your personal information to communicate with you, and you may opt out at any time by unsubscribing or changing your preferences.

[Our Anti-Spam Policy](#) tolerates only permission-based email. You always have the opportunity to opt-out of our marketing communications with you or change preferences by following a link in the footer of all non-transactional email messages sent by us or by emailing us at [info@marketculture.com](mailto:info@marketculture.com). In addition, anyone receiving emails from us on behalf of our trialers or customers always has the opportunity to opt-out of email messages from such customer or trialer by using the opt-out link included in the link in the footer of the message. If you believe that you have received an unsolicited commercial email from us on behalf of any of our trialers or customers, you may report it to us at [info@marketculture.com](mailto:info@marketculture.com). If you do not wish to have your personal information shared with third parties for co-marketing purposes, you may do so at any time by opting out of all marketing communications with us.

Some communications (for example, important account notifications and billing information) are considered transactional and are necessary for all of our trialers and customers. You must cancel your MarketCulture account, as applicable, to unsubscribe from these communications. To cancel your MarketCulture accounts, please see "Access to Personal Information" below. You may still receive marketing communications from us even after you cancel your account unless you also opt-out of our marketing communications, as described above.

To manage the information we receive about you from a social networking site or any other third party, you will need to follow the instructions from that party for updating your information and changing your privacy settings. The information we collect is covered by this privacy statement and the information the third party collects is subject to such third party's privacy practices. Privacy choices you have made on any third party site will not apply to our use of the information we have collected directly through our Sites.

If an account or profile was created without your knowledge or authorization, please contact us at [info@marketculture.com](mailto:info@marketculture.com) to request removal of the account or profile.

### **Access to Personal Information**

We take steps to ensure that the personal information we collect is accurate and up to date, and that you have the ability to access it and make corrections to it.

Upon request MarketCulture will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information please contact us at [info@marketculture.com](mailto:info@marketculture.com).

You can review and update your MarketCulture account information, including your organizational information and email address, by logging in and then clicking on the My Account tab. Account information, such as your username and password, can be changed by logging in and then clicking on the My Account link at the top of page. The My Account page is also where you can manage product subscriptions and billing information, such as your

credit card number. If you would like to suspend or cancel your account, request that we no longer use your account data or obtain further information about or access to your personal information, you can do so by contacting customer support via the Constant Contact [Help Center](#) or by telephone at (866) 289-2101 if you are located in the U.S. or (781) 472-8140 if you are located outside of the U.S. We will respond to your request for access within 30 days. You can review and update your SinglePlatform account information by contacting the SinglePlatform account management team directly at (866) 289-2087. If you would like to suspend or cancel your account, request that we no longer use your account data or obtain further information about or access to your personal information, you can do so by contacting the account management team at (866) 289-2087. We will respond to your request for access within 30 days.

We will retain and use your information for as long as your account is active or as needed to provide you with services, as necessary to comply with our obligations under this privacy statement and at law, resolve disputes, enforce our agreements and for backup purposes. Notwithstanding the foregoing, we may continue to disclose your storefront information to third parties in a manner that does not reveal personal information after you suspend or cancel your SinglePlatform account unless you request otherwise by calling the SinglePlatform account management team at (866) 289-2087.

### Cookies

Our website uses cookies to save your username and password if you become a member and decide to use the "Remember Me" option. This means you don't have to re-enter these items each time you visit our site.

A list of cookies used is provided in the table below:

Cookie name	Life span	Purpose
svSession	Permanent	Creates activities and BI
hs	Session	Security
incap_ses_\${Proxy-ID}_\${Site-ID}	Session	Security
incap_visid_\${Proxy-ID}_\${Site-ID}	Session	Security
nbi_{ID}	Persistent cookie	Security
XSRF-TOKEN	Persistent cookie	Security

Cookie name	Life span	Purpose
smSession	Two weeks	Identify logged in site members

### **Use of Your Personal Information**

As a registered user of this website, your personal contact information (including, your email or mailing address) may be used by us to send you information about our company, our products or services and to send you promotional materials. Your contact information may also be used to send you our newsletters, and information regarding changes to our policies or prices. We may also send you special offers on behalf of third parties. However, in doing so, no third party will be provided with access to your personal contact information. Further, you can always opt out of future offers and newsletters by selecting the “Opt Out” feature under your Account Preferences. We will not send you other email at the address you provide, except for communications related to your own MarketCulture Strategies account.

### **Other Information Usage**

We may share your personal information in a manner that does not identify you specifically nor allow you to be contacted but does identify certain criteria about our users in general. For example, we may inform third parties about the number of registered users, the nature of our visitors, and the pages most frequently browsed.

### **Protection of Children's Personal Information**

MarketCulture Strategies is a general audience website and does not knowingly collect any personal information from children. While our website may be viewed by children, we do not wish to receive data from children. MarketCulture Strategies encourages parents and guardians to spend time online with their children and to participate in the interactive activities offered on the sites their children visit. No information should be submitted to, or posted at, the MarketCulture Strategies web site by visitors under 18 years of age without the consent of their parent or guardian.



### **Confidentiality and Security of Personal Information**

Except as otherwise provided in this privacy policy, MarketCulture Strategies will keep your personal information private and will not share it with third parties unless disclosure is necessary to (i) comply with a court order or other legal process, or (ii) enforce the Terms of Use. Your personal information will be stored on secure servers that are not accessible by third parties except third parties providing hosting or other business services related to our website who are obligated to protect such information from disclosure to others.

### **Lost or Stolen Information**

You must notify us promptly if your user name or password is lost, stolen or used without your permission. In such event, we will remove or change your user name or password as directed by you and update our records accordingly.

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

This website contains links to other websites that are not controlled by MarketCulture Strategies ("Third Party Sites"). Please be aware that we are not responsible for the privacy practices of such Third Party Sites. We encourage our users to be aware when they leave our site and to read the privacy policies of each and every website that collects personally identifiable information. The MarketCulture Strategies privacy policy applies solely to information collected by this website.

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

MarketCulture Strategies reserves the right to change, modify or update this privacy policy at any time and without notice to you simply by posting the changed, modified or updated privacy policy. When we do, we will also revise the "last updated" date at the top of the privacy policy. Any such change, update or modification will be effective immediately upon posting on this website.

## Your rights and choices

MarketCulture cares about your personal information and we will be prepared to address any requests related to your individual rights under the GDPR. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data.

You can:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication, or send your request to [info@marketCulture.com](mailto:info@marketCulture.com).

How to exercise your data protection rights

If you wish to exercise any of the rights set out above, please send your request via email to [info@marketCulture.com](mailto:info@marketCulture.com).

## No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these

circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**Enforcement of this Privacy Policy and Contact Information**

MarketCulture Strategies welcomes your comments regarding our privacy policy.

IF FOR ANY REASON YOU BELIEVE THAT YOUR PRIVACY HAS BEEN BREACHED THROUGH THE USE OF OUR WEBSITE, YOU MAY CONTACT US IMMEDIATELY BY **E-MAIL (info@marketculture.com)**, AND WE WILL DO OUR BEST TO PROMPTLY DETERMINE AND CORRECT THE PROBLEM.