

Proxfinity Privacy Policy (June 2018)

Your Privacy Matters:

Proxfinity is committed to protecting the information of its website visitors and users of its products and services. Our Privacy Policy details the types of information Proxfinity collects from You, and explains how we gather, use, protect and share Your information. Please read this Privacy Policy carefully.

1. Privacy Policy Introduction

This Privacy Policy applies to information that Proxfinity may collect about You in connection with Your access or use of the Proxfinity Websites at proxfinity.com, portal.proxfinity.net, and proxfinity-central.proxfinity.com (together with any other websites and domains operated by us which You may access (the “Websites”), App (as defined herein), Device (as defined herein), Data (as defined herein), registration or other Proxfinity products, services or content offered by Proxfinity (collectively, “Services”), as well as through email messages that we send to You that link to the Services, and other communications (for example, customer support requests, surveys, and SMS texts) in which You may provide personal data to Proxfinity. This Privacy Policy, the Websites, Services, emails, and other electronic locations through which You may interact with Proxfinity to provide Your information are collectively referred to as the “Platforms.”

This Privacy Policy does not apply to third party applications or software that integrates with the Services through the Platforms, or any other third party products, services, or websites.

Your use of or access to the Platforms or Services constitutes your agreement to the terms and conditions of this Privacy Policy. If You do not agree to such terms and conditions, you should not access or use the Platforms or Services.

2. Who We Are

As used in this Privacy Policy, “Proxfinity” or “we” refers to Proxfinity, Inc.

“You” or “Your” refers to entities or individuals who access or use the Platforms and/or Services. For example, You may be a client of Proxfinity who accesses and uses the Platforms and Services as the host or organizer of an event, and with whom Proxfinity has entered an Agreement (as defined in the Terms & Conditions) or other agreement containing separate terms and conditions that govern delivery, access and use of the Platforms and Services. You may be the employee or agent of a Client (as defined in the Terms & Conditions), who is authorized to access Proxfinity’s Services or other information as an administrator. You may be a visitor to our Website who is just interested in browsing and learning more about Proxfinity. Or, You may be a Single-User or event attendee who is invited to, register for, check into, or receive information regarding a Client event through a Proxfinity Platform or Service, in which case we may provide any Personal Information You submit through the Platform or Service to the Client organizing that event.

Proxfinity does not control the Client’s event registration or management process, or the Personal Information that a Client requests from anyone, including You. We are not responsible

for any decisions or actions taken by the Client with respect to Your information (or by any third party with whom the Client may share Your information). Please read the applicable privacy policies of the Client who is organizing the event before submitting Personal Information in connection with that event.

When we collect information from You, we may be doing so on our own behalf (in which case we will be considered a “controller” of Your information), or on behalf of a Proxfinity Client who is using the Services to organize an event and manage other event-related activities (in which case, the Client will be the “controller” and Proxfinity will be considered a “processor” of Your information).

3. Information We Collect

You have choices about the information on Your profile, such as Your work experience, photo, city or area and other information, and You also have choices in answering any surveys or providing other information, including Personal Information, in connection with your use of or access to Proxfinity’s Services. You do not have to provide any information, however, profile and other information including Personal Information, information related to the Services, Websites and other information helps You to get more from our Services and Websites. This section describes the various kinds of information that Proxfinity may collect and store when You interact with us through the Platforms and/or Services.

Personal Information.

“Personal Information” is any information collected on or through our Platforms and/or Services including any emails or other communications that may be used to identify or personally contact You or another individual, or that relates to an identifiable person. Personal Information may include, but is not limited to, name, job title, company name, email address, mailing address, phone number, browser and device information (including IP Address), survey responses, matching and connections data, payment data and other identifying information You may provide to Proxfinity or to Client for a Client event.

You are not required to provide Proxfinity with any Personal Information. However, certain Proxfinity Services and Platform functionalities may not be available to You unless some Personal Information is provided by You, or by a Client or Client administrator on Your behalf.

If You are submitting Personal Information relating to any other person (including as a Client administrator, or on behalf of other individuals at Your company), You represent that You have full authorization to provide this information to Proxfinity, and to permit us to use it in compliance with this Privacy Policy.

Other (Non-Personal) Information

Non-Personal Information includes any information that is anonymized, aggregated or otherwise presented in a way that does not allow identification of a specific individual, or is not directly associated with a unique person.

To the extent that any Non-Personal Information is integrated with Personal Information in a manner that makes it impractical to separate, it will be considered Personal Information for purposes of this Privacy Policy.

4. How We Collect Information

From our Websites and Services

If You visit one of our Websites and request a free demo, register, subscribe to our blog, ask for Service information or download content (such as a white paper), You will be asked to provide certain Personal Information, including Your contact details.

We will use this Personal Information for purposes such as answering questions regarding our Service offerings, or initiating a sales dialogue.

Personal Information collected via Proxfinity's Services is collected from or on behalf of our Clients who are hosting or managing events, or from individuals who access our Services or otherwise complete event registration or provide information in connection with an event.

This type of Personal Information is controlled by the Client or You, and Proxfinity only collects and processes it at the Client's or Your direction, in accordance with instructions and permissions provided by the Client or You, including instructions and permissions contained in any Agreement or through Your acceptance of Proxfinity's Terms and Conditions, including those set forth in this Privacy Policy. With respect to this type of information, Proxfinity is a processor, and Client is the controller. Proxfinity provides notice regarding the purposes for which we are collecting Personal Information, through our Services and emails, and so that Client can also obtain or You can provide Your consent to the collection and use of such information, where appropriate.

From Offline Interactions

We may request and collect Your Personal Information offline as well – for example, when You attend a Proxfinity promotional event or a Client event, or if You call one of our sales representatives for information about our product offerings.

From Other Online Sources

Surveys – Client or we may ask You to participate in a survey, and Your responses could contain Personal Information.

Blogs – Our Website offers publicly accessible blogs and user forums. If You choose to comment or participate on these, please be aware that any information You provide in these areas may be read and used by other members of the public who access them. To request removal of Your personal information from our blog or any Proxfinity forum, contact us at **support@Proxfinity.com**. In some cases, we may not be able to remove Your personal information from these areas, in which case we will let You know if we are unable to do so and why.

In connection with Your use of the Platforms and/or Services, and in addition to the surveys, we may also request information about Your interests and preferences, to better provide connectivity with other event participants, as well as optional contact and interest information exchanges with others, communications, offers and content that are specifically tailored to Your personal interests, and to gather and exchange event-related information.

Automatic Information

As is true of most websites, we gather certain information automatically when You visit our Platforms, such as Your computer type (MAC or Windows), mobile device type, language, internet browser, any web pages that referred You to our Platform, and Your Internet Protocol (IP) Address (which may be identified and logged automatically in our server log files whenever You visit the Websites or Platform). We may also store general usage and activity data, such as the date and duration of Your visit, and Your navigation of the Platform. We use this information for reasons such as improving Platform performance, analytics, and functionality, and monitoring the regions from which users access our Websites or Services, in order to help us enhance the user experience and Platform security.

Cookies, beacons, tags and scripts may also be used by Proxfinity and our integration partners and analytics and service providers. These technologies are used in analyzing trends, administering the Platforms, tracking users' movements with the Devices while using our Services, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by our partners or providers on an individual as well as aggregated basis.

From the Device

When You use the Device in connection with a Client event, we collect Device usage data, interest data, data around connectivity with You and others as well as aggregated information. If, where applicable, You have requested or consented to location services in connection with Your use, we may receive information about Your location and Your mobile device. We use this information to provide You with location-based Services and other personalized content based on Your location. Most mobile devices enable You to shut off location-based services; please access Your mobile device's "Settings" for more information.

From Mobile Apps

When You download or use a mobile app or App created by Proxfinity in connection with a Client event, we collect app usage data, interest data, and data around connectivity with others, including aggregated information. If, where applicable, You have requested or consented to location services in connection with Your use, we may receive information about Your location and Your mobile device. We use this information to provide You with location-based Services and other personalized content based on Your location. Most mobile devices enable You to shut off location-based services; please access Your mobile device's "Settings" for more information.

From Email messages

If You contact Proxfinity using our customer service email, or any one of our informational email mailboxes (e.g., info@proxfinity.com or comment@proxfinity.com), we will store information such as the email address from which You sent the message, and use the information to reply to You.

From Other Sources

In order to better provide You with marketing offers and additional services that are of interest or relevant to You, we may obtain information from other sources, including public databases, marketing partners, social media platforms and other third parties.

Social Media features and Widgets

Our Website includes Social Media Features, such as the Facebook “Like” button, and Widgets, such as the “Share This” button or interactive mini-programs that run on our Website. These Features may collect Your IP address and information on which page You are visiting on our Website, and may set a cookie to enable the applicable feature or widget to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy (whether Proxfinity, Facebook, Instagram, or some other third party) of the company providing the feature, and You must contact them with any requests You may have for access, modification or deletion of Your Personal Information.

Information from Cookies

Proxfinity may collect additional information through the use of “cookies” which are small data files placed on Your computer’s hard drive to assign an identification code to Your computer. Proxfinity may use cookies for reasons including, but not limited to, identifying a registered user who logs into any Proxfinity Service, enabling certain customized features, and storing Your user preferences. We may also use cookies to collect aggregated user information that Proxfinity utilizes to improve the general operation of its Platforms and Services. You may set Your computer’s browser preferences to remove and disable cookies. But please note that some features of the Platforms or Services may not be accessible or operate properly if You disable Your cookies.

5. Our Legal Basis For Collecting and Processing Personal Information

Proxfinity’s legal basis for collecting and using the types of Personal Information described above will depend on the nature of the Personal Information, and the context in which we are collecting it. When Proxfinity collects, uses, processes or discloses Your Personal Information, we will rely on one or more of the following legal grounds:

Performance of a contract (including any agreement) – Where we need the Personal Information to perform our obligations under an agreement or other binding contract.

Consent – Where we have received Your consent to do so.

Legitimate Interests – Where it is in our legitimate business interests; for example, to improve our products and services.

Legal Requirement – If we are required to collect, use, process or disclose Your Personal Information due to a legal or regulatory requirement, we may do so.

6. How We Use Personal Information

Proxfinity may use Your Personal Information:

To respond to Your inquiries and fulfill Your requests, and to provide You with customer support when You ask for it.

To send You updates, newsletters and other content that You have requested or subscribed to, as well as informational materials regarding our Services.

To provide You with technical and administrative information relating to our Platforms and Services, such as security notices, Service-related status reports, and changes to our policies or terms of use. Please note that these communications are considered part of our Services and You may not opt out of them.

When You use the Device or other Services in connection with a Client event, we collect usage data, interest data, data around connectivity with You and others as well as aggregated information. If, where applicable, You have requested or consented to location services in connection with Your use, we may receive information about Your location and Your mobile device. We use this information to provide You with location-based Services and other personalized content based on Your location.

If You have consented and it is in compliance with applicable laws, to send You marketing communications regarding products and services that we believe may be of interest to You. If You later decide that You no longer want to receive this type of marketing or promotional information, You may opt-out at any time by clicking the “Unsubscribe” button at the bottom of the marketing communication, or contacting us at the email or mailing address provided in the **“Contact Information”** section of this Privacy Policy.

To personalize Your experience at the Client event or on the Platforms by offering content tailored to Your preferences.

For our internal business purposes that include administering Your access and use of any Proxfinity Services, data analysis, securely identifying You when You log onto a Service, fraud monitoring and prevention, enhancing or modifying our Platforms and Services, determining the effectiveness of our promotional campaigns, billing You for Services, and operating our business.

As necessary for us to comply with applicable law.

Also, please note that if information is aggregated or anonymized so that it is no longer reasonably associated or trackable to an identifiable natural person, it is no longer considered “Personal Information” under this Privacy Policy and Proxfinity may use it for any lawful business purpose.

7. Profiling and Automated Decision Making

Information You provide to us may be combined, analyzed or processed in a manner that helps us predict and determine Your interests and preferences, including what products and services

may be of interest to You, and when You might be ready to take certain steps (such as ordering a particular Service or connecting with other event participants), based in part on Your behaviors on the Platforms and interactions with Proxfinity.

8. How We Share Personal Data with Others

This section describes how Proxfinity shares or transfers the Personal and Non-Personal Information it collects about You, as well as Your ability to control how Your information is shared with others.

Personal Information. Except as provided in this Privacy Policy, Proxfinity will not disclose, transfer, sell, trade, rent, or otherwise provide Your Personal Information to any third party, without Your consent.

Aggregated Data. Proxfinity may share aggregated, non-personally identifying information, log data and usage statistics with third parties for purposes including demographic, industry and marketing analysis.

Affiliates. Proxfinity discloses Personal Information to its affiliates for the purposes described in this Privacy Notice. Proxfinity, Inc. is the entity responsible for the management of Personal Information shared among Proxfinity affiliates.

Service Providers. Proxfinity may use third party contractors to provide certain services and perform functions on our behalf. Examples include providing cloud-hosting capabilities, offering chat-bot functionality, processing credit card payments, providing marketing assistance, and performing statistical analysis relating to usage of our Platforms and Services. Proxfinity may provide Your Personal Information only to the extent necessary for such third party service provider to perform the duties for which it has been retained by Proxfinity. Any such third parties will be bound to strict confidentiality and use obligations with respect to Your Personal Information which are no less protective than those set out in this Privacy Policy.

Clients. If You are accessing any Platform or Service as an administrator or authorized user of a Client, or as an event attendee for an event organized by a Client, Proxfinity is permitted to provide the Client, and, where applicable and permitted under the applicable agreements, event sponsors, with Your information, including but not limited to Your Personal Information, access information and usage data.

Legal and Contractual Compliance. Proxfinity may disclose Your information to government or law enforcement officials, regulatory agencies or other third parties (such as attorneys or regulatory service providers), as necessary to (i) comply with applicable laws or regulations, (ii) cooperate with governmental or law enforcement investigations, (iii) respond to legal claims or processes, (iv) protect the safety and legal rights of the public or any individual, (v) detect, prevent or remedy any suspected fraud, market manipulation or illegal, tortious or wrongful activity; or (vi) enforce applicable Agreements or other Proxfinity contracts

Business Transfers. If Proxfinity is acquired by, acquires or is merged with another company, Proxfinity may transfer Personal and Non-Personal Information about You to such company. However, in the event of such a transfer, Your information will remain subject to the protections of this Privacy Policy.

Third Party Websites and External Links. Our Platforms may contain links to websites (including social media sites) owned and operated by third parties. When You click on such links, You may leave our Website and be directed to the third parties' websites. These websites may themselves collect Personal Information about You. If You submit information to any of those sites, Your information is governed by their privacy policies, which may differ from those of Proxfinity. Proxfinity is not, and will not be, responsible for the privacy practices or security of any such websites, and we urge You to read their privacy policies carefully.

Our Blogs and Social Media Pages. As we discuss above, You may disclose Personal Information during Your participation in our Blogs or on Social Media Platforms, including on message boards, in chats, and on any social media site on which You are able to post information and content. This Personal Information may appear in public ways, including through search engines or other publicly available platforms, and can be "crawled" or may be searchable by third parties. Please do not post any information that You do not want to be disclosed to the public.

Upon Your Consent. Other than as set out above, You will receive notice when information about You might go to third parties, and You will have an opportunity to consent to Proxfinity sharing this information.

9. How We Keep Personal Information Secure

Proxfinity makes it a priority to safeguard the security and privacy of Your Personal Information. Proxfinity has implemented appropriate organizational, technical and administrative measures to protect Your Personal Information from unauthorized access, disclosure, misuse, alteration or loss. The protective measures we use depend on the sensitivity of the information, and the ways in which we collect, process and store it.

In the event of any security breaches, we will make legally required disclosures to You via email or by providing notice on one or more Platforms, as applicable.

While we take reasonable steps to protect Your Personal Information, please be aware that no method of Internet transmission or electronic storage guarantees complete protection or is 100% secure, and there is always some risk when You share Your Personal Information online. Proxfinity therefore cannot guarantee the absolute security of Your Personal Information.

If You have any questions about security on our Platforms, You can contact us at support@Proxfinity.com.

10. How You Can Access, Correct, Update or Delete Your Information

Depending on Your user type and location, we provide You with various ways to access, download and request deletion of Your Personal Information.

If You are a registered user of any Proxfinity Platforms or Services (for example, a Client employee who has been assigned an administrator account for our Services or an event attendee), You can access, update, modify, correct or delete both Personal and Non-Personal Information, or opt to no longer receive communications, or to “opt-out” of certain Services, by contacting us directly at the Proxfinity email and/or mailing address provided in the “Contact Information” section of this Policy.

Please note that Proxfinity usually has no direct relationship with Event Attendees whose Personal Information Proxfinity processes on our platform or through our Services on behalf of a Client (the data controller). If You are an Event Attendee and use our platform or any Service and would like to access, correct or delete Your Personal Information, or would no longer like to be contacted by the Client controlling the information, please direct Your request to the Client. If the Client requests that Proxfinity remove the Personal Information, we will respond to their request in a timely manner.

Please be aware that we may need to retain certain Personal and Non-Personal Information for record keeping and archival purposes, or to complete any transactions that You initiated prior to requesting such change or deletion.

To request access to or copies of Your Personal Information, a change to Your Personal Information, deletion of Your Personal Information, or to withdraw Your consent to the collection, processing, and/or transfer of Your personal information, contact support@Proxfinity.com. Once we have received notification that You withdraw Your consent, we will no longer process Your information for the purpose(s) to which You originally consented unless there are compelling legitimate grounds for further processing which override Your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

11. How Long Will We Maintain Your Personal Information?

We will only retain Your Personal Information for as long as necessary to fulfill the purposes for which it was collected and processed, or until You request deletion as described in this Privacy Policy. At our discretion and at such time as we shall determine, we may delete information You provide, or which is otherwise collected from You, after an Event.

Proxfinity will retain Personal Information we collect from our Clients or Event Attendees, and process on behalf of a Client, for as long as necessary to provide our Services to the Client, and will maintain any such information controlled by a Client in accordance with the Client’s instructions, including any applicable Agreement terms, and as required by applicable law.

We will also retain and use Personal Information for a period of time required to comply with our legal, tax, audit or regulatory obligations, to resolve disputes, and to enforce our agreements.

Proxfinity may retain Non-Personal Information for as long as necessary for the purposes and uses described in this Privacy Policy, including as necessary for Proxfinity to pursue legitimate and lawful business interests.

12. Children

The Websites, platform and other Proxfinity Platforms and Services are not intended for children under thirteen (13) years of age. Proxfinity does not intentionally market any products or services to children under thirteen (13) years of age or knowingly collect any Personal Information from children under thirteen (13) years of age. We believe that children should get their parent's or legal guardian's consent before providing any Personal Information online.

13. Choices and Opting Out

You can always choose not to provide information, even though that means You might not be able to access certain Services or take advantage of certain Platform features offered by Proxfinity.

You may have consented to receive certain communications marketing or advertising Proxfinity Services and other products, in accordance with Your marketing preferences. You can opt-out of receiving these marketing messages at any time by sending us a request at the email and/or mailing address provided in the "Contact Information" section of this Policy.

Clients may use our Services to send You emails and other electronic communications, if You are on their email subscription lists or have registered for one of their events. Although these messages are sent using our Services, we don't determine the content or recipients of these messages. You should contact the Client directly, or click the "Unsubscribe" link provided in messages, if You no longer want to receive communications from that Client.

Even if You have opted to "Unsubscribe" from certain types of messages, please be aware that emails and other communications that respond to Your specific requests for information, or are provided as part of the Services You are still receiving, will be sent to You. You should contact us directly if You no longer wish to receive these responsive or transaction-related communications; but please be aware that if You "opt out" of these types of communications, You may no longer receive important messages regarding events that You are organizing or attending, or critical notifications regarding Your Services.

14. Third Party Sites

Our Platforms may include links to other websites whose privacy practices differ from those of Proxfinity. If You submit Personal Information to any of those sites, Your information is governed by their privacy policies. We encourage You to carefully read the privacy policy of any website You visit.

Also, please be aware that we are not responsible for the collection, use and disclosure policies (including privacy practices) of other companies, such as Facebook, Google, Instagram, Twitter, Apple or any other app developer, app store, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information that may be disclosed to such companies in connection with Your use of our social media pages, Proxfinity's Device, App, Data, Websites or other Services offered by Proxfinity.

15. Sensitive Information

Where we are collecting, storing and processing information on our own behalf, as a data controller, we will not request any sensitive Personal Information such as Your health history,

race, religion, or sexual orientation. We request that You do not send us such sensitive Personal Information on or through the Services, by email, or through any other means.

16. Questions, Concerns, Complaints – Contact Information

Your privacy is important to us. If You have any questions or concerns about privacy at Proxfinity, please contact us, and we will try to answer Your question or resolve any issues for You. You may contact us using the following information:

Proxfinity, Inc.
222 W. Merchandise Mart Plaza
Suite 1212
Chicago, Illinois 60654 USA
E-mail: support@Proxfinity.com
Phone: 1-312-544-0417

If You think we have not followed our Privacy Policy in some way, please contact Proxfinity Customer Support, using the information above. We take seriously any complaint, and it will be assessed by qualified staff with the goal of resolving it in a timely manner.

Subject to applicable law, You also have the right to lodge a complaint with Your local data protection authority about our collection and use of Your Personal Information. For more information, please contact Your local data protection authority.

If You are an Event Attendee, please direct any questions You may have regarding Your Personal Information to the Client organizing the event, not to Proxfinity. As noted previously in this Privacy Policy, if You are an Event Attendee for an event organized by an Proxfinity Client, Proxfinity processes Your Personal Information on behalf of that Client. The Client determines what Personal Information to request from You, how it is used, with whom it may be shared, and for how long it is retained.

17. Amendments to Privacy Policy

Our business is constantly evolving and, therefore, our Privacy Policy may be updated from time to time. Please visit this section of the Platform periodically to check for changes and updates to the Privacy Policy. If we make significant changes to this Privacy Policy, we may notify You either through the email address You have provided to us (unless You have instructed us not to), or by placing a prominent notice on our Website. If we materially revise our Privacy Policy, we will provide notice prior to its becoming effective. By continuing to access and use the Platforms and/or any Service after such notice, You agree to be bound by the terms of the revised Privacy Policy. Information You submit to Proxfinity is controlled by the privacy policy in effect at the time You submit it.