

# Nvestiv Privacy Policy

## Introduction

This privacy policy (“Privacy Policy”) is designed to inform you about Nvestiv Capital Corporation’s (“Nvestiv,” “we,” “us,” or “our”) policies and procedures for collecting, using, and disclosing your information in connection with your use of the Nvestiv service.

Nvestiv provides a web-based and mobile service (the “Service”) designed to assist users who have Nvestiv accounts (“Users”) with sharing their information, content, materials, files, and folders (together, their “Content”) and analyzing how their Content is viewed and/or received by their customers, prospective customers, and other third parties that are not registered Users of the Service (“Viewers”).

## Scope

This Privacy Policy governs your access of the Nvestiv Service, regardless of how you access it, and explains what data we collect when you use the Site and/or the Service, why we collect the data, how it is used, and your rights and choices.

This policy applies to personal data and other information collected by us from or about:

- visitors to, or users of, our Site and Service,
- prospective clients,
- current clients, and
- job applicants.

While providing our Service, we collect information related to Viewers on behalf of our Users. Our use of information on behalf of our Users is governed by our contract with the applicable User and the User’s own privacy policies. We are not responsible for the privacy policies or privacy practices of Users or other third parties.

By using our Site or the Service you consent to the collection, transfer, processing, storage, disclosure and other uses described in this Privacy Policy.

## 1. Information We Collect

When you interact with the Site or the Service and in connection with our events, and sales and marketing activities, we collect information that alone or in combination with other information could be used to identify you (“Personal Data”), as described below:

### A. Information You Provide as a User

When you register an account as a User, you may be asked to provide Personal Data including without limitation, your name, phone number, email address, home address or business address.

You may also choose to submit Personal Data to us when you send us an email or use any interactive features that we may make available on the Service. For example, you may ask us to: - import your contacts by giving us access to your third party services (such as your email account) or - use your social networking information if you give us access to your account on social network connection services.

You may also provide us with your contacts’ email addresses when sharing folders or files with them or if you invite them to join Nvestiv. In addition, if you sign up for our paid Service, you may be asked to provide additional information, including your credit card information, as described below.

### B. Events

We may also collect data from you including without limitation when you attend one of our events, during phone calls with sales representatives, or when you contact customer support.

### C. Employment Applications

When you apply for employment through the Site, our provider of recruiting services will collect your resume and any additional information that you elect to provide to us, including but not limited to your employment history and education. In addition, where permitted by law, we may use a third party to carry out a background check to determine your suitability for a position.

## **D. Information We Receive from Viewers**

If you are a Viewer, a User may request that you provide them with information (including Personal Data) via the Service in order to view that User's Content. In particular, in order to access Content that a User wants to share with Viewers, a Viewer may be asked to provide his or her email address upon opening a Nvestiv User's link (or Viewers' email address may be provided by the User). Nvestiv stores this information on behalf of our Users. In the event you as a Viewer provide a User with this information, you do so in accordance with that User's privacy practices and policies. Nvestiv is not responsible for the privacy practices of its Users, and only processes this information in accordance with the applicable agreement it has with each User. If you are a Viewer of one of Nvestiv's Users and would no longer like to be contacted by such User that uses Nvestiv's Service, please contact the User that you interact with directly.

## **E. Content**

In providing the Service, we process on behalf of Users information included in the Content that Users (and as appropriate Users' representatives, employees or other data subjects as elected by Users) upload, download, or access with, share, or send through the Service. If you add Content to your account that has been previously uploaded by you or another user, we may associate all or a portion of the previous Content with your account rather than storing a duplicate.

## **F. Information We Receive from Third Parties**

We may also receive Personal Data (such as your email address) through other Users, for example, if they have tried to share something with you or tried to refer Nvestiv to you. We may supplement the information that we collected from Users and Viewers (such as an email address) with additional information obtained from publicly available and third-party databases or services that provide information about business people and companies (including an individual's name, job title, business contact information, and company information), and display this information to our Users as a part of our Services.

## **G. Automatically Collected Information**

**i. Log Data** When you use the Service, we automatically record information from your Device, its software, and your activity using the Service. This includes the Device's Internet Protocol (IP) address, operating system, browser type, the web pages you visited before you came to the Site, the web pages you view immediately after leaving our Site, information you search for on the Site, locale preferences, identification numbers associated with your Devices, your mobile carrier, date and time stamps associated with transactions, system configuration information, metadata concerning the Content, and other interactions with the Content and the Service.

We collect this information in order to deliver the Service and to provide our Users with reporting and analytics relating to the use of the Service. This information is made available to Users via the Service (for example, we provide Users with information on a Viewer's location based on that Viewer IP address) and may be associated with other information about the User and its Viewers (including Personal Data) that Users provide us.

If you are a Viewer who views Content you receive from a User via the Service, we automatically collect information about your interaction with such Content and our Service. The information we collect includes:

- Whether or not you have viewed or are viewing Content;
- Date and time you viewed the Content;
- Number of times and length of time Content was viewed; Which portions of the content were viewed; and
- Your IP address and location.

**ii. Cookies And Other Tracking Technologies.** We use "cookies" (small data files that we transfer to your Device) and other tracking technologies to operate and administer the Site and the Service, analyze trends, serve advertisements, and improve your access to, and use of, our Service. For more information about the cookies and similar technologies used on our Site and Service, please refer to our Cookie Policy here: <https://www.Nvestiv.com/cookie-policy/>

## **2. How We Use Information**

### **A. Provide Information; Respond to Requests**

When you ask for information about the Service (for example, when you request a demo or ask us to send you offers or price information), or register to a webinar or an event, we will use your contact information to respond to your request. For EU data subjects, such use is necessary to respond to or implement your request.

### **B. Provide the Service to Users**

We use account-related data provided by Users in connection with the purchase, sign-up, use, or support of the User account (such as usernames, email address and billing information) to provide you with access to the Service and/or the Site, contact you

regarding your use of the Service and/or the Site, or to notify you of important changes to the Service and/or the Site. For EU data subjects, such use is necessary for the performance of the contract between you and us.

We process Personal Data relating to Viewers and your Content on your behalf for the purpose of providing the Service and to provide our Users with reporting and analytics relating to your interaction with your Content and our Service, in accordance with the applicable User contract. Data relating to Viewers that we receive through the Service will be made available to Users who communicate with Viewers via the Service, and may be associated by Users with other information about Viewers (including Personal Data) that Users have provided us or that Viewers have provided to Users via the Service. Nvestiv does not use or access Viewers' Personal Data collected by its Users through their use of the Service except with a User's permission, in order to provide the Service, and to provide related support and assistance.

### **C. Sending Users Marketing Communications and Other Announcements**

We may use your email or mail address to send you information (as applicable) by email and post about new products and services, upcoming events or other promotions. If you receive an unwanted email, please follow the "unsubscribe" instructions in the promotional email we send you. Please note that if you opt out from marketing communications, we may still contact you regarding issues related to our Service and to respond to your requests. Based on applicable law, our sales representatives may also use your phone number to contact you directly by phone, in connection with such new products and services, upcoming events or other promotions.

Where required by applicable law (for example, if you are an EU data subject), we will only send you marketing information by email or mail, or contact you by phone, if you consent to us doing so at the time you provide us with your Personal Data. When you provide us with your consent to be contacted for marketing purposes, you have the right to withdraw your consent at any time by following the instructions to "opt-out" of receiving marketing communication in each marketing email we send you. In addition, if at any time you do not wish to receive future marketing communications or wish to have your name deleted from our mailing or calling lists, please contact us at support@nvestiv.com. Please note that if you opt out from marketing communications, we may still contact you regarding issues related to our Service and to respond to your requests.

### **D. For Legitimate Business Interests**

We use data relating to your use of and interaction with the Site and the Service, including information that we receive through cookies and similar technologies, for certain legitimate business interests or to fulfill our contract with you, which include the following:

- to provide, administer, and support the Site and the Service;
- to personalize and improve your access to and use of the Site and the Service (including to increase our Service's functionality, product features, and user-friendliness);
- to verify users have the authorization needed for the Service to process their requests;
- to inform our marketing strategy and personalize our communications with you (including providing or offering software updates, information on our features and other marketing and service-related announcements relevant to the content and features you engage with);
- to conduct research and development, analytics and report on industry trends on content usage and performance;
- to meet our corporate and social responsibility objectives;
- if you ask us to access, update, or delete your data or to be removed from our marketing lists, we will keep basic data to identify you and prevent further unwanted processing; and
- for internal business/technical operations, including auditing, maintaining the quality and safety of our Site and Service, troubleshooting and repairing errors, data analysis, testing, preventing malicious, fraudulent, or illegal activity, misuses of our products or services (including the prosecution of those responsible for such activity) and ensuring the security of our Site, Service, IT systems, architecture, and networks.

For EU data subjects, this use of your Personal Data is necessary for our legitimate interests in understanding how the Site and our Service are being used by you and to improve your experience on it. For cookies placed through our Site, where required by the applicable law, we rely on legitimate interest or your consent – please read our Cookie Policy for more information on how we use cookies and other tracking technologies.

## **3. Information Sharing and Disclosure**

### **A. Your Use**

We will display your Personal Data on your profile page and elsewhere on the Service according to the preferences you set in your account. You may access and change these preferences at any time as described in Section 4. Any Personal Data you choose to provide should reflect how much you want others to know about you.

When Viewers receive Content from Users, we show a User's name to the relevant Viewer. We also give our Users the ability to provide their contact information within the document viewer to the relevant Viewers. We show a Viewer's email address and

name to the User who sent the Content through our Service, if the Viewer has provided his or her email address.

We may also share or disclose your information with your consent, for example, if you use a third party application to access your account (see below). Through certain features of the Service, you may also have the ability to make some of your information public. Public information may be broadly and quickly disseminated. Please consider carefully what Personal Data you disclose in your profile page and our Service, and your desired level of anonymity.

## **B. Employees, Service Providers, Business Partners, and Others**

We will disclose your Personal Data to our employees as necessary to deliver the Service, and we may use certain third party companies and individuals to help us provide, support, analyze, and improve the Service (such as providers of data storage services, maintenance services, payment processing (described below), database management, providers of analytics services who help us understand how you use and interact with the Site and the Service, providers of CRM, marketing, and sales software solutions, vendors who assist with recruiting, talent and background checking). These third parties may have access to your Personal Data for the purpose of performing these tasks on our behalf and pursuant to our instructions, under obligations similar to those in this Privacy Policy.

## **C. Other Nvestiv Companies**

Nvestiv shares infrastructure, systems, and technology with other companies owned or operated by Nvestiv (“Nvestiv Companies”) to provide, improve, protect, and promote services provided by Nvestiv Companies. We process your Personal Data across the Nvestiv Companies for these purposes, as permitted by applicable law and in accordance with their terms and policies.

## **D. Third-Party Applications**

We may share your information with a third party application with your consent, for example when you choose to access our Service through such an application. We are not responsible for what those parties do with your information, so you should make sure you trust the application and that it has a privacy policy acceptable to you.

## **E. Advertising Partners**

Through our Services and on social media sites, third party advertising partners may set cookies, technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day).

## **F. Compliance with Laws and Law Enforcement Requests; Protection of Nvestiv’s Rights**

We may disclose to parties outside Nvestiv files stored in your Nvestiv account and information about you that we collect when we have a good faith belief that disclosure is reasonably necessary to

1. comply with a law, regulation, or compulsory legal request;
2. protect the safety of any person from death or serious bodily injury;
3. prevent fraud or abuse of Nvestiv or its users;
4. to protect Nvestiv’s property rights.

If we provide your Content to a law enforcement agency as set forth above, we will remove Nvestiv’s encryption from the files before providing them to law enforcement. However, Nvestiv will not be able to decrypt any files that you encrypted prior to storing them on Nvestiv.

## **G. Business Transfers**

If we are involved in a merger, acquisition, bankruptcy, or sale of all or a portion of our assets, your information may be transferred as part of that transaction, but we will notify you (for example, via email and/or a prominent notice on our Site) of any change in control or use of your Personal Data or Content, or if either become subject to a different Privacy Policy. We will also notify you of choices you may have regarding the information.

## **4. Changing or Deleting Your Information**

If you are a registered User, you may review, update or correct the Personal Data provided in your registration or account profile by changing your “account settings.” If you would like to delete your account, please contact us as indicated below. If your Personal Data changes, or if you no longer desire our Service, you may update it by making the change on your account settings. In some cases we may retain copies of your information as described in Section 5 below. For questions about your Personal Data on our Service, please contact support@nvestiv.com.

## 5. Data Retention

We will retain your Personal Data for as long as is necessary for the purposes set out in this Privacy Policy, for as long as your account is active, or as needed to provide you the Service or for the duration required by law, whichever is the longer. If you wish to delete your account or request that we no longer use your information to provide you the Service, you may ask that we delete your account by emailing support@nvestiv.com. We may retain, use or disclose your information (including Personal Data) as necessary to comply with our legal obligations, to resolve disputes or enforce our agreements, and carry out our legitimate business interests (such as for analytics purposes, safety, and security). Consistent with and subject to these requirements, we will try to delete your information quickly upon request. In addition, we do not delete from our servers Content that you have in common with other Users.

## 6. Nvestiv Team Users

If you're using Nvestiv on an account tier that provides account administration ("Nvestiv Team User"), your administrator may be able to:

- access information in and about your Nvestiv Team User account;
- disclose, restrict, or access information that you have provided or that is made available to you when using your Nvestiv Team User account;
- and control how your Nvestiv Team User account may be accessed or deleted.

Please refer to your organization's policies if you have questions about your Administrator's rights.

## 7. Nvestiv Community

Our Service may offer publicly accessible community services such as blogs, forums, and wikis. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. Your posts may remain even after you cancel your account. For questions about your Personal Data on our Service, please contact support@nvestiv.com.

## 8. Collection and Use of Information by Third Parties

### A. General

Third parties are under no obligation to comply with this Privacy Policy with respect to Personal Data that you provide directly to those third parties or that those third parties collect for themselves. We do not control the third-party sites that may be accessible through this Service. Thus, this Privacy Policy does not apply to information you provide to third-party sites or gathered by the third parties that operate them. Before visiting a third-party site, whether by means of a link on this Service or otherwise, and before providing any Personal Data to any third party, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that site, and should take those steps necessary to your discretion, to protect your privacy.

### B. Third Party Collection of Your Credit Card Information

If you choose to subscribe to a Purchased Service payment of which is via credit card, our third party credit card processor (Stripe) will process your credit card. Accordingly, you authorize Nvestiv to collect, use, retain, and disclose your credit card and other payment information to Stripe and represent and warrant that you have all necessary rights to disclose such information to us. In addition, we may share your personal Data with trusted third parties who are integral to the operation of our Service, including but not limited to financial institutions, payment processors, verification services and credit bureaus, as well as any third parties that you have directly authorized to receive your Personal Data.

Nvestiv does not receive or store credit card information on our servers. We receive a transaction "token" and a one-time use ID number so we can validate that the transaction has been successfully completed. Areas of this Service that collect your Personal Data use industry standard secure socket layer encryption; however, to take advantage of this your browser must support encryption protection.

### C. Other Third Party Collection of Other Information

We may use third party companies including Google, Kissmetrics, and Intercom to provide us with analytics information. These companies may collect Personal Data and other information from you via our Site and Service.

Our advertising partners may use Personal Data (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as "interest-based advertising" or "online behavioral advertising." We may allow access to other data collected by the Services to share information that may be useful, relevant, valuable, or otherwise of interest to you. If you prefer not to share your Personal Data with third party advertising partners, you may use your device's platform controls in your settings to exercise choice.

We may also allow you to log in to our Service using third party accounts such as LinkedIn and Google. If you use these services, they may collect Personal Data from you via our Site and Service.

## 9. Additional Information for Chrome Extension

We provide a Chrome extension that you may use in conjunction with your Nvestiv account. The information we receive through this extension from Google APIs is handled in adherence with the Chrome Web Store User Data Policy, including the Limited Use requirements.

## 10. Your Privacy Rights

### A. Scope

Our Privacy Policy describes why and how Nvestiv collects, uses and stores your Personal Data, the lawful basis on which your Personal Data is processed, and what your rights and our obligations are in relation to such processing (please see “Your Rights” section below).

### B. Nvestiv as Processor

Nvestiv is the data controller for processing of your Personal Data, but we act as a data processor for Personal Data that we process on behalf of our Users. Please see the “Contacting Us” section below to find out how to contact us.

### C. Your Rights

Subject to applicable law, you have the following rights in relation to your Personal Data:

- **Right of access:** If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data along with certain other details.
- **Right to rectification:** If your Personal Data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. If we shared your Personal Data with others, we will tell them about the correction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so you can contact them directly.
- **Right to erasure:** You may ask us to delete or remove your Personal Data, such as where our legal basis for the processing is your consent and you withdraw consent. If we shared your data with others, we will tell them about the erasure where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your Personal Data with so you can contact them directly. We may continue processing Personal Data where this is necessary for a legitimate interest in doing so according to applicable law, as described in this Privacy Policy.
- **Right to restrict processing:** You may ask us to restrict or ‘block’ the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of the data or object to us processing it. We will tell you before we lift any restriction on processing. If we shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so you can contact them directly.
- **Right to data portability:** You have the right to obtain your Personal Data from us that you consented to give us or that was provided to us as necessary in connection with our contract with you. We will give you your Personal Data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.
- **Right to object:** You may ask us at any time to stop processing your Personal Data, and we will do so if we are relying on a legitimate interest to process your Personal Data — unless we demonstrate compelling legitimate grounds for the processing; or if we are processing your Personal Data for direct marketing.
- **Right to withdraw consent:** If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing of your data before we received notice that you wished to withdraw your consent.
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

You may exercise your rights by contacting us as indicated under the “Contacting Us” section below.

### D. Legitimate Interest

“Legitimate interests” means our interests in conducting our business, managing and delivering the best Service to you. This Privacy Policy describes when we process your Personal Data for our legitimate interests, what these interests are and your rights. We will not use your Personal Data for activities where the impact on you overrides our interests, unless we have your consent or those activities are otherwise required or permitted by law.

## **E. Data Transfers**

When transferring data from the European Union, the European Economic Area, the United Kingdom, and Switzerland, Nvestiv relies upon a variety of legal mechanisms, such as contracts with our users and affiliates, Standard Contractual Clauses, and the European Commission's adequacy decisions about certain countries, as applicable.

## **11. Security**

The security of your information is important to us. We follow generally accepted standards to protect the Personal Data submitted to us, both during transmission and once we receive it. No method of electronic transmission or storage is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Site, you can contact us at [support@nvestiv.com](mailto:support@nvestiv.com).

## **12. Online Tracking**

We currently do not respond to "Do Not Track" (DNT) or similar signals. We operate as described in this Privacy Policy whether or not a DNT signal is received.

## **13. Changes to our Privacy Policy**

This Privacy Policy may change from time to time. If we make a material change to this privacy policy, we will provide you with notice (for example, by email if you have provided your email address to us and your email address is current), and we may provide notice of changes in other circumstances as well. It is therefore important that you register with us and notify us if you change your email address. If you do not provide us with a current email address, you should regularly review this policy to ensure that you are informed of any changes.

## **14. Contact Us**

If you have any questions about this Privacy Policy, please contact us at [support@nvestiv.com](mailto:support@nvestiv.com).