

Privacy Policy

Effective: 04 May 2020

Introduction

Our Privacy Policy will help you understand what information we collect at Names & Faces, how we use it, and what choices you have.

When we talk about “Names & Faces,” “we,” “our,” or “us” in this policy, we are referring to the Names & Faces Group of Companies which is currently made up of Names & Faces, Inc (USA) and Names & Faces UK Ltd (UK).

Applicability of this Privacy Policy

This Privacy Policy applies to Names & Faces’ online people directory tools and technologies, including the associated Names & Faces mobile software and desktop applications, the backend management tools, all outputs of the Names & Faces back-end systems (collectively, the “**Services**”), www.namesandfaces.com and other Names & Faces websites (collectively, the “**Websites**”) and other interactions (for example customer service inquiries, etc.) you may have with Names & Faces. If you do not agree with the terms, do not access or use the Services, Websites or any other aspect of Names & Faces’ business.

This Privacy Policy does not apply to any third party applications or software that integrate with the Services (“**Third Party Services**”), or any other third party products, services or businesses.

An explanation of the service we provide

We provide our Clients with tools to create digital directories containing information relevant to our Client and allow for the controlled distribution of these directories (“**Names & Faces Directories**”). Our Client uploads photographs and information (“**Client Information**”) to our Services about employees, scholars, members, clients, partners or people otherwise associated with the Client. It is the Client’s responsibility to ensure they have the necessary consent to gather and publish this Client Information. Our Client then grants permission to a specified group of users (“**Authorized End Users**”) to securely access

the Client Information through the Names & Faces Services. Our Client may, for example, use the Services to grant and remove access to Names & Faces Directories, assign roles and configure settings, access, modify, export, and remove Client Information and otherwise apply its policies to the Services.

Names & Faces use Client Information in accordance with our Client's instructions, including any applicable terms in the [Client Term of Service](#), the [User Terms of Service](#) and as required by applicable law. Names & Faces is a processor of Client Information and Client is the controller.

What to do if you want to change the information featured in our Services

The information made available via our Services is provided by the Client and not the User. Unless otherwise specified, information made available via the Services may only be changed by the Client.

Should you have any objections or concerns relating to the use or inclusion of any information included in a Names & Faces directory, you should first address this with the Client, as they are responsible for the content of their Names & Faces directory. If you receive no response from the Client, please feel free to email us at hello@namesandfaces.com and we will make every effort to resolve the matter.

Consent to processing of personal data

By making use of our Services you automatically agree to our [User Terms of Service](#). You also agree to our use of your personal data in accordance with this privacy policy. If you are under eighteen (18) years of age your parent or guardian must have indicated their consent to our use of your personal data in accordance with this privacy policy prior to your use of the Services.

Occasions where we may contact you

By agreeing to these terms you grant us consent to contact you via email or via any of our Service channels in order to help you make effective use of the Services, to ask for feedback and explore other potential applications of our products and Services, announce new

functionality and share any other notifications relevant to the Services, including notifications from other Users and the Client.

Information we collect and receive

Names & Faces may collect and receive the information, including personal data, as listed below. We do this to provide the Names & Faces Services to our Clients, to better understand how our Services are being used, to provide feedback and statistics to our Clients, and to determine how best to improve our Services.

1. **Account information.** To create or update a Names & Faces account, you or the Client (e.g., your organization) supply Names & Faces with an email address, password, or use Single Sign-on to start using our Services. In addition, Clients that purchase a paid version of the Services provide Names & Faces (or its payment processors) with billing details such as credit card information, banking information and/or a billing address. We use account information to notify you of any changes to the Services or to seek feedback on the Services, as well as for billing, account management and other administrative matters.
2. **Usage information.** This is information about how you are accessing and using the Services, which may include information about the organizations you access, how regularly you access the Services, the content you view, the links you interact with, and the third party integrations you use (if any). We use this information to assess how successfully the Service is being adopted by the user base, to better understand how to improve our Service and to provide feedback to our Client.
3. **Communication information.** This is any administrative and/or support communication you engage in with us. We use this information as a record of our communication with Users and Clients in order to better serve them when new enquiries arise.
4. **Log data.** When you use the Services and Websites our servers record information, including information that your browser sends us. This log data may include your Internet Protocol address, the address of the web page you visited before using the

Services and/or Websites, your browser type and settings, the date and time of your use of the Services and/or Websites, information about your browser configuration and plug-ins, language preferences, and cookie data. We use this information to better understand the geographies where our services are being used and the technology platform's users are accessing the Services and/or Websites from, allowing us to improve our Services over time and provide feedback to our Client.

5. **Device information.** We may collect information about the device you are using the Services or Websites on, including what type of device it is, what operating system you are using, device settings, application IDs, unique device identifiers, and crash data. Whether we collect some or all of this information often depends on what type of device you are using and its settings. We use this information to improve our services over time.
6. **Geo-location information.** Your precise GPS location is not collected by our Services or Websites. The location of your nearest mobile data tower is collected. This provides us with a general location to help us better understand where people are using our Services and Websites.
7. **Services integrations.** If, when using the Services, you integrate with a third party service, we will connect that service to ours. The third party provider of the integration may share certain information about your account with us. We do not, however, receive or store your passwords for any of these third party services.
8. **Third party data.** We may also receive information from affiliates, partners, or others that we use to make our own information better or more useful. This might be aggregate level information, such as which IP addresses go with which postal codes, or it might be more specific information, such as about how well an online marketing or email campaign performed.
9. **Single Sign-On Information.** Single Sign-On (“SSO”) allows you to sign in to your account to use our Services from another service you use and with which we partner. We will collect certain information for security purposes in order to verify

your authorized access to our Services, including your username and password for the other service.

Use of cookies

We use cookies to distinguish you from other users of our Websites and Services. This helps to provide you with a good experience when you use our Websites and Services and allows us to improve our offering. For detailed information on the cookies we use and the purposes for which we use them please see our [Cookie Policy](#).

Protection of Personal Information (POPI) - South African Clients and Users Only

We are committed to taking steps to protect your privacy when you use our Services and Websites. We implement business practices that comply with all relevant legislation, including, if you are registered and/or residing in South Africa, the Protection of Personal Information Act 4 of 2013 ("POPI").

When we refer to "personal information" or "information", we mean personal information as defined in POPI. It includes, for example, your full name, surname, email address, identity number, contact details, and location.

We implement appropriate technical and other security measures to protect the integrity and confidentiality of your information. We protect and manage information that we hold about you by using electronic and computer safeguards such as firewalls, data encryption, and physical and electronic access control to our buildings. We only grant access to the personal information contained in our Services to those employees who require it to fulfil their designated responsibilities.

Any personal information we may have of yours will only be used as described in the [User Terms of Service](#).

General Data Protection Regulation (GDPR) - EU Clients and Users Only

The following terms will have the following meanings in this section and pertain primarily to users of Clients that are contracting with Names & Faces UK Ltd:

Data Protection Legislation means:

- (a) the EC Directive 1995/46/EC on the protection of individuals with regard to the processing of personal data and on the free movement of such data and all local laws or regulations giving effect to this Directive;
- (b) the EC Directive 2002/58/EC on Privacy and Electronic Communications and all local laws or regulations giving effect to this Directive;
- (c) GDPR;
- (d) all relevant laws or regulations implementing or supplementing the EU legislation mentioned in (a) - (c) above, including elements of the EC Regulation 2016/679 incorporated into or governed by national law relevant for the Services; and
- (e) any related codes of conduct or guidances issued by the Regulator or other governmental entity.

GDPR means the EC Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (when in force).

References in clause to “data controller”, “data processor”, “processing”, “data protection officer” and “personal data” shall have the same meaning as defined in Data Protection Legislation.

In respect of personal data provided to Names & Faces during the course of providing the Services, the Client is the data controller and Names & Faces is the data processor. Names & Faces shall process all personal data in accordance with its obligations under Data Protection Legislation and its obligations under the Master Service Agreement.

Data Protection Legislation gives you the right to access personal data held about you. Your right of access can be exercised in accordance with the 1998 Data Protection Act of the Parliament of the United Kingdom or the GDPR as applicable.

We implement appropriate technical and other security measures to protect the integrity and confidentiality of your information. We protect and manage information that we hold about you by using electronic and computer safeguards such as firewalls, data encryption, and physical and electronic access control to our buildings. We only grant access to the personal information contained in our Services to those employees who require it to fulfil their designated responsibilities.

Any personal information we may have of yours will only be used as described in the [Client Term of Service](#), the [User Terms of Service](#).

Sharing your personal information/ personal data

We will keep your personal information confidential at all times. We will only share it with others with your explicit consent or with carefully selected third parties who perform services for us that are essential to the provision of our service (e.g. data hosting). All these service providers are contracted to us and have a legal obligation to secure your personal information and to use it only in ways that we permit.

You agree that we have the right to disclose your personal data to any member of our group which means our subsidiaries, our ultimate holding company and its subsidiaries.

We will disclose your personal data to third parties:

- (a) in the event that we sell or buy any business or assets in which case we may disclose your personal data to the prospective seller or buyer of such business or asset;
- (b) if Names & Faces or substantially all of its assets are acquired by a third party in which case personal data held by it about its customers will be one of the transferred assets;
- (c) if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request;
- (d) in order to enforce the [Client Term of Service](#), the [User Terms of Service](#); and
- (e) in order to protect the rights, property or safety of Names & Faces Clients and Users.

If you believe we are using your information unlawfully or would like further details of these third parties, please contact us at hello@namesandfaces.com.

International storage of data

We may transfer the information stored in our Services to countries other than the country in which our Clients and Users are based for retention purposes or if our service providers are cross border or use systems cross border. If you use our Services, you agree that we may transfer your information cross border for these purposes. In respect of such transfers Names & Faces and the Client have in place the Standard Contractual Clauses between a contractor and processor (Commission Decision C(2010)593) commonly known as the EU Model Clauses.

General

Any changes we make to our privacy policy in the future will be updated in this document / posted on this page, and where appropriate any major amendments will be notified to you.

Site owner: Names & Faces, Inc.

Legal status: Names & Faces, Inc. is a Delaware Corporation with EIN Number: 61-1898625 and place of business at 500 University Avenue, Palo Alto, CA 94301, USA.

Director: Paul Galatis

Description of main business of Names & Faces: development and licensing of technology that gives organizations and individuals the ability to create, customize and distribute lists to closed, qualified communities of users.

Email address: hello@namesandfaces.com

Website address: <https://www.namesandfaces.com/>

Physical address: 125 University Ave, Palo Alto, CA 94301, USA

Postal address: 125 University Ave, Palo Alto, CA 94301, USA

Registered address: 500 University Avenue, Palo Alto, CA 94301, USA