

IMPACT OBSERVATORY

PRIVACY POLICY

Effective: April 20, 2022

Impact Observatory is committed to protecting your personal and other information and your right to privacy. Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your personal information with us.

Impact Observatory (“IO”, “we” or “us”) provides this Privacy Policy to inform you about our policies and procedures regarding the collection, use and disclosure of personal and other information on our Website at: impactobservatory.com (the “Website”) and any other websites, features, applications, widgets or online services that are owned or controlled by us (collectively, the “Services”). This policy also applies to our proprietary “IO Navigator” software platform (the “Platform”). If there is a conflict between this policy and the agreement between us and our clients to access the platform, the agreement will govern.

Personal information (or personal data) means information about an individual from which that person can be identified. It does not include personal information where the identity has been removed (anonymous personal information).

This Privacy Policy explains how we may use and disclose such personal information, as well as your ability to control certain uses of it. When you interact with us through the Website or Services, we may collect information from you, as further described below. The Privacy Policy also applies when you contact us, including via email or by telephone.

By accessing the Website or using the Services, you consent to the information collection, disclosure and use practices described in this Privacy Policy. Please note that certain features or services referenced in this Privacy Policy may not be available at all times.

INFORMATION WE COLLECT

Information You Provide to Us

We collect information from you when you choose to provide it to us. This may include when you create an account with us, use our Services, agree to be contacted about our products or services or otherwise contact us. These types of personal information may include your name, email, address, title or position. Whenever you directly provide us with your personal information, please be sure it is accurate and complete. We cannot be responsible for any information you provide to us that is incomplete or incorrect.

Information We Collect Automatically

To maintain and improve the Website and Services, we may automatically gather some statistical data when you visit. The exact information we collect may vary but can include the date and time of access to the Website, the Internet Protocol (IP) address of a computer requesting a page, the pages requested, computer and connection information such as device and browser type and operating system. We do not

associate this statistical information with personal information that we otherwise collect. Also, we may use third party analytics providers to help us understand and use this statistical data.

IO Navigator Platform

Access to basic features of our Platform is available to the general public and does not require login credentials to access the platform. This includes access to publicly available science datasets.

Access to advanced features of our Platform is available only to our clients that have entered into a direct contractual relationship with us. Clients will designate an account administrator and other authorized users. IO will provide clients and their authorized users with unique login credentials to access the platform. All authorized users will need to provide limited personal information – e.g., name and work email -- to access the platform. If there is a conflict between this Privacy Policy and the Platform agreement between IO and a client, the agreement will govern.

Advanced access to the Platform is private in that user content is private to members of the workspace and not accessible by other platform users. If a client uploads personal data belonging to or regarding any individual, such as location data that shows movement of an individual over time, that personal information is not accessible or used by IO or any third party.

We follow the Payment Card Industry Data Security Standard (PCI DSS) when handling credit card data.

HOW WE USE INFORMATION

We may use the information we collect from and about you to:

- provide the Services, including the Platform, and its contents to you;
- process your registration with the Services, including verifying the information that you provide to us;
- send you communications, such as newsletters or to advise of new services or changed services;
- provide customer service to you, including, without limitation, to respond to your questions, complaints or comments, request feedback, and otherwise contact and communicate with you;
- improve the content and functionality of our Services and for internal business purposes and marketing efforts;
- conduct research and analysis, develop new products;
- comply with applicable laws, including to respond to requests from public and government authorities;
- enforce this Privacy Policy;
- protect our rights, privacy, safety or property, and/or that of you or others
- develop new programs, products or services
- protect the security or integrity of the Services, the Platform and our business;
- provide you with notices about your access to the Services or Platform, including expiration and renewal notices;
- contact you with regard to your use of the Services or Platform, and, in our discretion, changes to the our policies; and
- as described to you at the point of data collection or otherwise with your consent, and as further described in this Privacy Policy;

INFORMATION SHARING AND DISCLOSURE

We may share and disclose the personal information we collect from and about you, or you provide to us, as follows to:

- our affiliates and subsidiaries;
- designated Service Providers or other third parties we use to support our business, to enable them to perform a business, professional or technical support function for us;
- as necessary if we believe that there has been a violation of this Privacy Policy, our rights or the rights of any third party;
- to fulfill the purpose(s) for which you provide your information;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- to respond to judicial process or provide information to law enforcement or regulatory agencies or in connection with an investigation on matters related to public safety, national security or law enforcement, as permitted by law, or otherwise as required by law;
- with your consent; and
- as described to you at the point of data collection.

We may contract with third parties to perform functions related to the Website and Services (“Service Providers”). Service Providers will have access to your personal information needed to perform their business functions but may not use or share that personal information for other purposes. These companies are authorized to use your personal information only as necessary to provide these support services to us.

If we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Services of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information

If another entity acquires us or any of our assets, including information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use the personal information we have collected in a manner that is consistent with this Privacy Policy.

AGGREGATE DATA

IO reserves the right to create aggregate data from our clients’ use of the Platform and mapping attributes they create. Aggregate data is used only for our internal analysis to better understand how our Services used and to improve them. Any such aggregate data will not include any personal information that clients may upload to the Platform or otherwise make available to us, including personal information associated with clients’ authorized users.

COOKIES AND TRACKING TECHNOLOGIES

A cookie is a piece of data stored on your computer’s hard drive that contains information about you and your computer. The cookies used on the Website do not contain any identification that would be useful to another individual or organization. We use cookies, for example, to remember your login information so you do not have to enter a username and password each time you return to the Website (should you

choose this option). We also use cookies to provide statistical information on Website usage and personalize and enhance the online experience. Some of these cookies may be active during the time you are viewing a website (“session cookies”). Other cookies may remain on your computer after you have closed your browser or turned off your computer (“persistent cookies”).

The following cookies are deployed on the Website:

- **Strictly Necessary Cookies:** These cookies are strictly necessary to provide the Website. For example, they are used to authenticate and identify returning users.
- **Performance and Functionality Cookies:** These cookies provide statistical information on site usage, such as web analytics. They also help us to personalize and enhance your online experience.

Just like any other usage information we collect, information from cookies allows us to improve the Website and customize your online experience. You can set your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. See www.allaboutcookies.org to learn how to disable cookies on your browser or otherwise opt out of cookies. However, if you set your browser to disable all cookies or opt out, some features of the Website may not function properly.

This Privacy Policy does not cover the use of cookies used by third parties, and we are not responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Website.

We also use web beacons and pixels on our websites and in emails. For example, we may place a pixel in our emails that notify us when you click on a link in the email. We use these technologies to operate and improve our Website and emails.

Google Analytics

We use Google Analytics to track Website views and general/aggregate data on website users. For more information on how Google uses personal and other information when using its partners' sites or apps, please visit this webpage from Google. To provide website visitors more choice on how their data is collected by Google Analytics, Google has developed an [Opt-out Browser](#) add-on to enable you to opt-out of Google Analytics.

LINKS

The Website may contain links to third-party websites. IO is not responsible for the privacy practices of such other websites. We encourage you to read the privacy statements of each website that you visit. This Privacy Policy applies solely to information collected by IO.

CHILDREN'S PRIVACY

The Website and Services are directed to adults over 18 years old. Children under 18 are not permitted to use the Website or Services. We do not knowingly collect information from persons under 13 years of age. If you are under 13, you should not access our Website, create an account, or provide any information to us. If you believe that we have collected the Personal Information of persons under 13, please inform us at legal@impactobservatory.com so that we may delete the information.

DATA SECURITY

We have implemented appropriate physical, administrative, and technical steps to safeguard the information we collect from and about our customers and Services visitors and users. While we make every effort to help ensure the integrity and security of our network and systems, we cannot 100% guarantee our security measures. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) login ID and password for access to the Services, you are responsible for keeping this information confidential. We ask you not to share your password with anyone as we cannot be responsible for a data breach or other incident if a login ID and/or password is used by unauthorized persons.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted over the internet. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

DATA STORAGE IN US

IO is located in the United States. Your personal information is stored on servers in the United States. You understand and agree that we may collect, use, disclose, and otherwise process the information you provide as described in this Privacy Policy, even if you are from an area outside the United States. Your personal information may be disclosed in response to inquiries or requests from government authorities or to respond to judicial process in the United States.

DATA RETENTION

We will retain your personal information for as long as it is needed to provide you with the Services or to fulfill any legal or contractual obligations we may have. When an account is closed, any associated personal information will be deleted from our systems to the extent technically possible and consistent with applicable law.

CALIFORNIA PRIVACY RIGHTS

For California residents under the age of 18 and registered users of the Website, California law (Business and Professions Code § 22581) provides that you can request the removal of content or information you posted on the Website. Any such request should be sent to us at either email at: legal@impactobservatory.com along with a description of the posted content or other information to be removed. Be advised, however, that applicable law may not permit us to completely or comprehensively remove your deleted content or for other reasons as set forth in California law.

Pursuant to California's "Shine The Light" law (California Statute § 1798.983), California residents are entitled, once a year and free of charge, to request the disclosure of certain categories of personal information to third parties for their own direct marketing purposes in the preceding calendar year, if any. You may request this information by contacting us at legal@impactobservatory.com and indicate in the email subject line, "California Shine The Light Request." Please include your mailing address, state of residence and email address with your request.

We do not share or transfer personal information to third parties that would constitute a "sale" under the California Consumer Privacy Act.

We do not currently honor browsers' Do Not Track signals with respect to the Website.

NO RIGHTS OF THIRD PARTIES

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of the Website.

CHOICES AND RIGHTS

Subject to applicable law, an individual has the right to request from us a copy of what personal information that we have collected or to ask to correct or update their it. Individuals can also request that we delete their personal information from our systems and records. We strive to respond to these requests with 30 days or as required in accordance with applicable law.

If you have an account with us, you may sign-in to your account and update your personal information contained in the account. You may also send us an email at legal@impactobservatory.com to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your account. Please note, however, that we may not be able to accommodate a request to change or delete your information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We will not collect, use, or disclose your personal information in any way or for any purposes that are materially different from the purposes described in this policy. If in the future we wish to collect, use or disclose your personal information in a materially different way, we will obtain your consent first, and offer you the choice to opt-out of the proposed change.

If we send you promotional or marketing messages, you will be able to opt out of receiving our marketing or promotional email communications by using the "Unsubscribe" feature at the bottom of the email from us or by requesting to opt out by emailing us at legal@impactobservatory.com . Please note that you cannot opt out of receiving transactional communications from us regarding services you request or have access to, your account other transactional or administrative issues.

POLICY CHANGES

If we change this privacy policy in any material way, we will notify you at least thirty days in advance by posting a notice of the change prominently on our Website or notify our account holders via email. Changes will not be applied retroactively to information obtained under the previous policy without your express consent.

CONTACT US

If you have any questions about this privacy policy or other privacy questions about us, please email us at legal@impactobservatory.com or write to us at:

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