

# Improvise Data Privacy Policy

*This privacy statement is effective as of October 28, 2020 and will regularly be updated to reflect any changes in the way we handle your personal data or any changes in applicable laws.*

**Improvise takes your privacy seriously.**

**This Privacy Policy explains the type of personal information we collect, what we do with it, what we don't do with it, and how we keep it safe. Please read the following information carefully to understand our views and practices regarding your personal data and how we will treat it.**

This Privacy Policy ("Policy") describes the privacy practices of Improvise LLC ("Company," "we," and "our") with regard to data that we collect through websites operated by us ("Sites"), through our social media pages and apps ( and others (collectively, "Social Media Pages"), through email/text messages we send to you that link to this Policy, and through other services ("Services") provided by us both online and offline. "You" or "user" refers to any individual who visits or otherwise uses the Sites, Social Media Pages, or Services. "Customer" refers to any person or entity who contracts with us to purchase a product or service.

**Who we are:** For the purpose of applicable data protection legislation, the data controller of your personal data is Improvise LLC 39073 Ebbetts St Newark CA 94560

**Changes to this Policy:** We will post any modifications or changes to the Policy on this page. We reserve the right to modify the Policy at any time, so we encourage you to review it frequently. The effective date above indicates when this Policy was last changed.

**What is not covered by this Policy:** This Privacy Policy does not apply to the practices of third parties that Improvise does not own or control, or to individuals that Improvise does not employ or manage. Our Sites and Services may contain links to third party websites and incorporated their technology and services; these third parties have their own privacy policies and we do not accept any responsibility or liability for their websites, features, or policies.

## **1. What Types of Information Do We Collect?**

## **Personal Data**

We may collect personal data about you such as your name, postal address, email address, and telephone number. As used in this Policy, “personal data” is as defined in the UK Data Protection Act 1998/the European Data Protection Directive 95/46/EC/General Data Protection Regulation 2018 and any successor legislation.

If you contact us, complete surveys, or post comments or other content on or through our Sites and Services, we may collect that information.

### **2. Why Do We Collect This Information?**

The primary reason that we collect information from you is to provide you with the Services that you request and to enhance your experience at our Sites. We also use the information we collect to make sure that our Sites and Services provide you with the resources you need and to improve the products and services we offer. See the section below on “How Do We Use Your Data?”

### **3. How Do We Collect Your Personal Data?**

We collect information about you in the following ways:

**Information You Give Us.** This may include data you provide when you register to use our Services, any comment or other submission you post to our Sites, any information you provide in connection with a promotion or marketing/sales program we operate, any data you provide with regard to customer support, any data you provide when you correspond with us by phone, email, or otherwise, and any other information you may provide to us. When you agree to give us information, you provide us with the legal basis we require under applicable law to process your data. We will only process your personal data in accordance with applicable data protection and privacy laws. You maintain the right to withdraw such consent at any time.

**Information We Get From Others.** We may also get information about you from other sources. For example, if your settings for your use of Social Media Sites permit it, we may access, use, and store the information that you agreed the Social Media Sites could provide in order to track your engagement with our content. We will access, use, and store that information in accordance with this Policy. You can revoke our access to the information you provide in this way at any time by amending the appropriate settings from within your account on the applicable Social Media Sites. If you have agreed to share information with one of our partners, we may add data about you collected by our partner to the information we already have.

**Cookies.** We may collect information using “cookies.” Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session

cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Sites.

### Types of cookies

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings. If you do not accept our cookies, you may experience some inconvenience in your use of our Sites and Services. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit.

**Pixel Tags.** We may also use pixel tags (which are also known as web beacons and clear GIFs) to track the actions of both anonymous and known users on our Sites. Pixel tags are embedded invisibly on webpages. Pixel tags measure engagement with our site and content to help us provide relevant information to visitors and is used to determine the success of our marketing campaigns so that we can manage our programs more effectively. The behavioral and campaign information we collect using pixel tags is linked to a users’ personal data contact record for only known visitors.

## 4. How Do We Use Your Data?

We may use your personal data as follows, depending on whether you are a general user of our Sites or Services, or a Customer:

- To operate, maintain, and improve our Sites and Services.
- To fulfill the requirements and activities specified in the Customer’s Master Services Agreement and related Order Forms and Statements of Work .
- To administer Customer systems, test systems, and develop and implement changes.
  - Any temporary copies of Customer data created as a necessary part of this process are only maintained for time periods relevant to those purposes.
  - We may access and/or use a copy of the Customer’s test, development, or production environment, including Customer data, to test such new configurations, versions, patches, updates, and fixes, and to validate that they work to required specifications.
  - Improwise does not control its Customers’ information collection or the use practices for Customer data. If a Customer provides any Customer data to Improwise, the Customer is solely responsible for providing any notices and/or obtaining any consents necessary for Improwise to access and use Customer data as specified in this Policy and the Customer’s Master Services Agreement.
- To share with our third party service providers and subcontractors who provide services such as data analysis, payment processing, information technology and related infrastructure provision, customer service, email delivery, auditing, and other similar services. These third parties are only permitted to use your personal data to

the extent necessary to enable them to provide their services to us. They are required to follow our express instructions and to comply with appropriate security measures to protect your personal data.

- To share with third parties where you have provided your consent to do so.
- To send customer service information including technical notices, updates, security alerts, and support and administrative messages.
- With your consent, to send you marketing e-mails about educational content, upcoming promotions, and other news, including information about products and services offered by us and our affiliates. You may opt out of receiving such information at any time; such marketing emails tell you how. Please note, even if you opt out of receiving marketing emails, we may still send you non-marketing emails. Non-marketing emails include emails about your account with us (if you have one) and our business dealings with you.
- To link or combine user information with other personal data.
- As we believe necessary or appropriate (a) to comply with applicable law, (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements, (c) to enforce our Policy, and (d) to protect our rights, privacy, safety, or property, and/or that of you or others.

Improviser does not share your personal information with non-affiliated third parties.

## **5. How Is Your Data Secured?**

Improviser employs reasonable organizational, technical, and administrative measures to protect personal data within our organization. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem.

## **6. How Long Is Your Data Retained?**

We retain personal information only as necessary for the duration of the purposes outlined in this Policy, unless a longer retention period is required or permitted by law.

## **7. What About Children?**

Our Sites and Services are not directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us. We will delete such information from our files as soon as reasonably practicable.

## **8. What About Sensitive Information?**

We ask that you not send us or disclose any sensitive personal data (for example, social security numbers, information related to racial or ethnic origin, sexual orientation, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through the Sites or via other means.

## **9. What Are Your Rights With Regard to Your Personal Data?**

**Opt out.** You can always opt not to disclose information. If you elect to do so, however, we will likely be limited in responding to your inquiry, or you may not be able to take advantage of some of our Sites and Services. You may contact us anytime to opt out of (a) direct marketing communications, (b) any new processing of your personal data that we may carry out beyond the original purpose, or (c) the transfer of your personal data outside the United States.

**Access.** If you would like to access, correct, amend, remove, or limit the use or disclosure of any personal data about you that has been collected and stored by Improvise, notify us so that we may consider and respond to your request in accordance with applicable law. For your protection, we only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we need to verify your identity before implementing your request. We will respond to your request within 30 days.

**Corrections and Updates.** It's best for both you and us if the information we have on record about you is complete and accurate, so we encourage you to correct any information that might be outdated or otherwise invalid. You also have the right to request erasure of your data. Please note that we need to retain certain information for record keeping purposes and/or to complete any transactions that you began prior to requesting such access, change or deletion.

**Data Protection Authorities.** You may have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority in the European Economic Area (EEA), Switzerland, and certain non-European countries including the US and Canada.

Contact us at [manu@improvsieinc.com](mailto:manu@improvsieinc.com) to exercise any of these rights.

### **California Privacy Rights**

California Civil Code Section § 1798.83 entitles California residents to request information concerning whether a business has disclosed personal information to any third parties for the third parties' direct marketing purposes. To make such a request, please contact [manu@improvsieinc.com](mailto:manu@improvsieinc.com)

You may contact us by email at [manu@improvsieinc.com](mailto:manu@improvsieinc.com) at any time, to request that we:

- a. update any personal information which is out of date or incorrect;
- b. delete any personal information which we are holding about you;
- c. restrict the way that we process your personal information;
- d. provide your personal information to a third-party provider of services; or
- e. provide you with a copy of any personal information which we hold about you.

We will consider all such requests and provide our response within the time period stated by applicable law.

You have the right to ask us to not process your personal information for marketing purposes. We will inform you (before collecting your personal information) if we intend to use your personal information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your personal information. Alternatively, you can contact us by email at [manu@improvsieinc.com](mailto:manu@improvsieinc.com) at any time.

If you have previously given your consent to the use of your personal information for marketing purposes, you can choose to stop receiving marketing communications which we send to you from time to time by following the unsubscribe instructions included in such communications.

## **Complaints**

We are committed to resolving any complaints about our collection or use of your personal data. For more information, please reach us at [manu@improvsieinc.com](mailto:manu@improvsieinc.com)