

## **Impartner Privacy Policy**

Effective Date May 22, 2021 – November 3, 2022

This Privacy Policy applies to the websites owned and operated (“Website”) by Impartner, Inc., formerly known as Treehouse Interactive, Inc (Impartner, We, Us, or Our). This Privacy Policy describes how Impartner collects and uses the personal data collected through the Website (including, but not limited to, [www.impartner.com](http://www.impartner.com)) and Services located behind the logins of Impartner Applications. It also describes individual rights regarding the use of, access to, and how to update, correct, or remove personal information. The use of information collected through Our service shall be limited to the purpose of providing the service for which Impartner is engaged.

Impartner respects each individual's right to personal privacy. We will collect and use information through Our Website only in the ways disclosed in this Privacy Policy. We have created this Privacy Policy to let you know what information we collect when you visit Our site, why we collect it, and how it is used. By using this website, you consent to the data practices prescribed in this Privacy Policy.

If you have questions or complaints regarding this Privacy Policy or Our practices, please contact Us via email at [dataprocessing@impartner.com](mailto:dataprocessing@impartner.com) or via phone at 801-501-7000.

### **Privacy Shield**

Impartner participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. Impartner is committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, respectively, in reliance on each Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Frameworks, and to view our certification, visit the U.S. Department of Commerce's Privacy Shield List. <https://www.privacyshield.gov>

Impartner is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Impartner complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Impartner is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Impartner may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that We have not addressed satisfactorily, please contact Our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

### **Program Interfaces and Images**

Images may not be reproduced without written permission. All images are the property of Impartner and/or its respective clients. Any interface examples (designs, layouts, functionality, processes, images, source code, compiled code, workflows etc.) or demos may NOT be copied or duplicated in any form. All content on this Website is the exclusive Intellectual Property and Copyright of Impartner 1996-2021. You are violating Copyright laws if you engage in any such activity and will be prosecuted to the fullest extent of the law for any such violation.

### **Information Collected**

Personal information means any information that may be used to identify an individual. The personal information We collect may include your name, address, email address, IP address, and information regarding what pages are accessed, or other contact information, whether at work or at home.

In a few areas on Our Site, We ask you to provide personal information that will enable Us to enhance your site visit, to assist you with technical support issues or to follow up with you after your visit. It is completely optional for you to participate.

For example, We request information from you when you:

- Request a quote
- Request more information including, but not limited to files or document downloads
- Request support
- Participate in a sweepstakes or other promotional offers
- Subscribe to a newsletter or a mailing list

### **How we use your information**

Impartner only uses your personal information for specific purposes. Your information may be used to:

- Generate Quotes
- Send you requested information about Impartner
- Provide support
- Market Impartner products or services to you
- Provide you with access to Impartner services

Personal information you provide will be kept confidential and used to support your customer relationship with Our company.

All email communication with you will be on an Opt-In basis. This is solely at your discretion. Occasionally, We will send you e-mail communications with information, which may be useful to you, including information about Our products and services or about offerings from affiliates or business partners. When you first provide Us with your e-mail address, you will be given the option of not receiving any such e-mail communications. We will include instructions in Our e-mail messages on how to unsubscribe if you later decide you do not want to receive any future e-mail communications. At any time, you can easily opt-out of receiving further marketing from Impartner by contacting Us at the address below and requesting to have your name removed from Our lists.

When you use Our "Forward this to a Friend" feature in any of Our email sent to you, We need to collect your friend's name and email address in order for Us to complete this one-time transaction of forwarding the email to your friend. We do not store this information collected only for this purpose. If you believe that one of your contacts has provided Us with your personal information and you would like to request that it be removed from Our database, please contact Us at the contact information below.

### **Log Files/Tracking Service**

As is true of most Web sites, We gather certain information automatically and store it. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

We use Google Analytics, which uses cookies and other technologies to track non-personal information about visitors to Our site to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about Our user base as a whole.

We also link some automatically-collected data to personal information for demographic research and marketing purposes. IP addresses, for example, are tied to personal information. We track the opening of emails originating from Our company, record URL's visited on Our website, download of documents from

Our Website and forms filled out on Our Website in association with Our marketing campaigns and associate it to personal information for some visitors for marketing purposes.

## **Tracking Technologies**

Technologies such as cookies or similar technologies are used by Impartner and Our analytics provider (e.g. Google). These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about Our user base as a whole.

We use cookies, to remember users' settings (e.g. language preference), for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use Our site, but your ability to use some features or areas of Our site may be limited.

We partner with a third party to either display advertising on our website or to manage our advertising on other sites. Our third-party partner may use technologies such as cookies to gather information about your activities on this website and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#) (or if located in the European Union, click [here](#)). Please note this does not opt you out of being served ads. You will continue to receive generic ads. To learn more, read Our cookie policy by clicking [here](#).

## **Information Sharing and Disclosure to Third Parties**

Agents or contractors of Impartner may have access to your personal information for the purpose of performing services on behalf of Impartner. All such agents or contractors who have access to your personal information have Data Processing and Confidentiality obligations to keep the information confidential and not use it for any other purpose than to carry out the services they are performing for Impartner. Impartner may also share your personal information with its customers and their partners as part of Impartner's Service.

Unless We tell you otherwise, or unless otherwise stated in this Privacy Policy or required by law, We do NOT sell or rent your personal information to any third parties. However, We might share your personal information with Our affiliates, hosting services providers, and resellers (and with the Impartner Client with whom you have a relationship) if allowed to do so under applicable laws. The affiliated companies and resellers may be in the United States or in other parts of the world. We may also share de-identified data with Our customers. When you submit personal information to Us during your visit to Our Web sites, We will let you know how you can (a) prevent Our use of this information for marketing purposes or, (b) if We are required to do so under applicable laws, prevent the disclosure of this information to third parties for marketing purposes, if you so choose. If you do not want Us to share your personal information with these affiliated companies or resellers, contact Us at the email address below.

Information collected from you is only used to complete and support your purchases from Impartner and use of the Site and to comply with any requirements of law. Impartner may disclose personal information if required to do so by law or in the good faith belief that such action is necessary to: (1) conform to the edicts of the law or comply with legal process served on Impartner or this Site; (2) protect and defend the rights or property of Impartner; or (3) act in urgent circumstances to protect the personal safety of users of Impartner, its web sites or the public.

We may collect and possibly share your information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Our terms and conditions posted on Our Web sites, or as otherwise required by law.

If Impartner is 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 Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information. We may also disclose your personal information to any other third party with your prior consent.

## **Information Collected Through the Impartner Service**

Impartner collects information under the direction of its Clients and has no direct relationship with the individuals whose personal data it processes. Impartner works with its Clients to help them provide notice to their customers concerning, the purpose for which personal information is collected.

We collect information on behalf of Our Clients, if you are a customer or partner of one of Our Clients and would no longer like to be contacted by one of Our Clients that use Our service, please contact the Client that you interact with directly.

Impartner may transfer personal information to companies that help Us provide Our service. Transfers to subsequent third parties are covered by the provisions in this Privacy Policy regarding notice and choice and the service agreements with Our Clients. These companies are authorized to use your personal information only as necessary to provide these services to Us.

Impartner has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his query to Impartner's Client (the data controller). If the Client requests Impartner to remove the data, We will respond to their request within 30 business days.

Impartner will retain personal data We process on behalf of Our Clients for as long as needed to provide services to Our Client. Impartner will retain and use this personal information as necessary to comply with Our legal obligations, resolve disputes, and enforce Our agreements.

### **California Consumer Privacy Act**

The California Consumer Privacy Act of 2018, California Civil Code Sections 1798.100 et seq. ("CCPA") affords certain rights to you if you are a California resident. If you are a California resident, California law permits you to request information regarding the disclosure of your personal information to third parties for the third parties' direct marketing purposes. To make such a request, please Contact Us and include "California Privacy Rights Request" in the first line of the request.

### **Security of Your Information**

The security of your personal information is important to us. We follow generally accepted industry standards (including but not limited to Secure Servers, IPsec, Firewalls, Encryption and more) to protect the personal information submitted to us, both during transmission and once it is received. Of course, there is no such thing as perfect security on the Internet. You are responsible for maintaining the secrecy of your passwords or any account information. Please be careful and responsible whenever you're online. If you have any questions about the security of your personal information, you can contact Us at the contact information below.

### **Third-Party Sites**

Please be aware that other web sites that may be accessed through Our site may collect personal information about you. The information practices of those third-party web sites linked to Our Site are not covered by this Privacy Policy.

### **International Transfers**

Personal information collected on this Site may be stored and processed in the United States, and by using this Site, you consent to any such transfer of information outside of your country.

### **Children's Privacy**

This Site is not intended for or directed to persons under the age of 13. Any person who provides their information to Impartner, and who the company subsequently finds out is under 13, will have all such data removed. Any persons submitting data to Impartner on this Site represents to Impartner that they are 13 years of age or older.

### **Impartner Blog:**

Our Web site offers a publicly accessible blog. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from Our blog or community forum, contact Us at [dataprocessing@impartner.com](mailto:dataprocessing@impartner.com). In cases of legal compliance or contractual obligations, We may not be able to remove your personal information, in which case We will let you know if We are unable to do so and why.

### **Social Media (Features) and Widgets:**

Our Web site includes Social Media Features (Features), such as the Facebook and Twitter button. These Features may collect your IP address, which page you are visiting on Our site, and may set a cookie to enable the Feature to function properly. Features are either hosted by a third party or hosted directly on Our Site. Your interactions with these Features are governed by the privacy policy of the company hosting the Features.

### **Access to Personal Information**

Upon request, Impartner will provide you with information about whether We hold, or process on behalf of a third party, any of your personal information. To request this information please contact Us at [dataprocessing@impartner.com](mailto:dataprocessing@impartner.com).

You may access, correct, or request deletion of your personal information by logging in to your account or by contacting Us at [dataprocessing@impartner.com](mailto:dataprocessing@impartner.com). In certain circumstances We may be required by law to retain your personal information, or may need to retain your personal information in order to continue providing a service.

We will respond to these requests within a reasonable timeframe.

### **Data Retention**

We will retain your information for as long as your account is active, per the terms of any written agreement with Us or as needed to provide you services. If you wish to cancel your account or request that We no longer use your information to provide you services, contact Us at [dataprocessing@impartner.com](mailto:dataprocessing@impartner.com). We will retain and use your information as necessary to comply with Our legal obligations, resolve disputes, and enforce Our agreements.

### **Changes to this Privacy Policy**

We may update this Privacy Policy from time to time, solely at Impartner's discretion to reflect, among other things, changes to Our information practices. If We make any material changes, We will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on Our privacy practices.

### **Contacting Impartner**

For questions or comments regarding this Privacy Policy or to make changes to your personal information, please [click here](#).

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