

RippleMatch Privacy Policy

This Privacy Policy describes the policies and procedures of RippleMatch Inc. (“we”, “our” or “us”) on the collection, use and disclosure of your information on <https://www.ripplematch.com/> (the “Site”) and the services, features, content or applications we offer on the Site or through our owned and operated social media accounts (collectively with the Site, the “Services”). We receive information about you from various sources, including: (i) if you register for the Site and the Services, through your user account on the Services (your “Account”); (ii) your use of the Services generally; and (iii) from third party websites and services. When you use the Services, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy.

For the purposes of the EU General Data Protection Regulation 2016 (the “GDPR”), RippleMatch Inc. is the data controller and is responsible for your Personal Information.

What Does This Privacy Policy Cover?

This Privacy Policy covers the treatment of personally identifiable information (“Personal Information”) gathered when you are using or accessing the Services. This Privacy Policy also covers our treatment of any Personal Information that our business partners share with us or that we share with our business partners.

The term “Personal Information” as used in this Privacy Policy includes any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to you.

This Privacy Policy does not apply to the practices of third parties that we do not own or control, including but not limited to any third party employers, websites, services and applications (“Third Party Services”) that you elect to access through the Service or to individuals that we do not manage or employ. While we attempt to facilitate access only to those Third Party Services that share our respect for your privacy, we cannot take responsibility for the content or privacy policies of those Third Party Services. We encourage you to carefully review the privacy policies of any Third Party Services you access.

What Information Do We Collect?

The information we gather enables us to personalize, improve and continue to operate the Services. In connection with certain aspects of the Services, we may request, collect and/or display some of your Personal Information. We collect the following types of information from our users.

Account Information:

If you create an Account, you will provide information that could be Personal Information, such as your name, educational background, work history, and interests, as well as a username, password and email address. You acknowledge that this information may be personal to you, and by creating an account on the Services and providing Personal Information to us, you allow others, including us, to identify you and therefore may not be anonymous. We may use your contact information to send you information about our Services, but only when we feel such information is important, and where you have given your consent if required under applicable law. You may unsubscribe from these messages through your Account settings, although we, regardless, reserve the right to contact you when we believe it is necessary, such as for account recovery purposes.

User Content:

Some features of the Services may allow you to provide content to the Services, such as a detailed educational and work profile and a resume. All content submitted by you to the Services may be retained by us indefinitely, even after you terminate your account.

If you are a European resident, we will store your Personal Information in a form that permits us to identify you for no longer than is necessary for the purpose for which the Personal Information is processed. We store your Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and rights, or if it is not technically and reasonably feasible to remove it. Otherwise, we will seek to delete your Personal Information within a reasonable timeframe upon request.

We may continue to disclose such content to third parties in a manner that does not reveal Personal Information, as described in this Privacy Policy.

IP Address Information and Other Information Collected Automatically:

- We may automatically receive and record information from your web browser when you interact with the Services, including your IP address and cookie information. This information is used for fighting spam/malware and also to facilitate collection of data concerning your interaction with the Services (e.g., what links you have clicked on).
- Generally, the Services automatically collect usage information, such as the number and frequency of visitors to the Site. We may use this data in aggregate form, that is, as a statistical measure, but not in a manner that would identify you personally. This type of aggregate data enables us and third parties authorized by us to figure out how often individuals use parts of the Services so that we can analyze and improve them.
- We may collect some device-specific information if you access the Services using a mobile device. Device information may include but is not limited to unique device identifiers, network information, and hardware model, as well as information about how the device interacts with our Services.
- We may combine this information with information you give to us and information we collect about you. We will use this information and the combined Personal Information for purposes set out in this Privacy Policy (depending on the types of information we receive).

Email Communications:

We may receive a confirmation when you open an email from us. We use this confirmation to improve our customer service.

Information Collected Using Cookies:

- Cookies are pieces of text that may be provided to your computer through your web browser when you access a website. Your browser stores cookies in a manner associated with each website you visit. We use cookies to enable our servers to recognize your web browser and tell us how and when you visit the Site and otherwise use the Services through the Internet. The cookies we use on the Site are as follows:
 - a) Session cookies: These temporary cookies expire and are automatically erased whenever you close your browser window. We use session cookies to grant our users access to content and to enable actions they must be logged in to do.
 - b) Persistent cookies: These usually have an expiration date in the distant future and remain in your browser until they expire or you manually delete them. We use persistent cookies to better understand usage patterns so we can improve the site for our customers. For example, we may use a persistent cookie to associate you with your Account or to remember your choices on the Site.
 - c) Third party cookies: We permit limited third parties to place cookies through the Site to provide us with better insights into the use of the Site or user demographics or to provide relevant advertising to you. These third parties may collect information about a consumer's online activities over time and across different websites when he or she uses our Site. For example, we utilize Google Analytics to analyze usage patterns of the Site. Google Analytics generates a cookie to capture information about your use of the Site which Google uses to compile reports on website activity for us and to provide other related services. Google may use a portion of your IP address to identify their cookie, but this will not be associated with any other data held by Google.
- Our cookies do not, by themselves, contain Personal Information, and we do not combine the general information collected through cookies with other Personal Information to tell us who you are. As noted, however, we do use cookies to identify that your web browser has accessed aspects of the Services and may associate that information with your Account if you have one.
- Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. We strongly recommend that you leave cookies active, because they enable you to take advantage the most attractive features of the Services.

- We may also permit third parties to place cookies through the Site, as indicated above, to perform analytic or marketing functions. We do not control the use of such third party cookies or the resulting information and we are not responsible for any actions or policies of such third parties.

Information Related to Advertising and the Use of Web Beacons:

To support and enhance the Services, we may serve advertisements, and also allow third parties advertisements through the Services. These advertisements are sometimes targeted and served to particular users and may come from third party companies called “ad networks.” Ad networks include third party ad servers, ad agencies, ad technology vendors and research firms. We may also use analytics service providers to analyze how you interact and engage with our Services and our advertisements, so we can learn and make enhancements to offer you a better experience. Some of these entities may use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites and better understand your online activity.

Advertisements served through the Services may be targeted to users who fit a certain general profile category and may be based on anonymized information inferred from information provided to us by a user, including Personal Information (e.g., gender or age), may be based on the Services usage patterns of particular users, or may be based on your activity on Third Party Services. We do not provide Personal Information to any ad networks for use outside of the Services.

To increase the effectiveness of ad delivery, we or our service providers may deliver a file (known as a “web beacon”) from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Because your web browser must request these advertisements and web beacons from the ad network’s servers, these companies can view, edit or set their own cookies, just as if you had requested a web page from their site.

Through the Digital Advertising Alliance (“DAA”) and Network Advertising Initiative (“NAI”), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of and greater control over ads that are customized based on their online behavior across different websites. To make choices about interest-based ads from participating third parties, please visit the DAA’s or NAI’s consumer opt out pages, which are located at <http://www.networkadvertising.org/choices/> or www.aboutads.info/choices.

Information Related to Advertising Directed at European Residents

If you are based in the EU, we will only share your Personal Information with unaffiliated third parties for direct marketing purposes, or send you direct marketing communications related to our own or third party products and services, if you have given your consent to receiving that marketing.

We will generally ask for your consent in line with the applicable law when you first provide your Personal Information. You can choose to stop receiving direct marketing communications from us at any time simply by following the “Unsubscribe” or “Manage Email Preferences” link at the bottom of any promotional email, or by changing your Account settings.

Aggregate Information:

We collect statistical information about how both unregistered and registered users, collectively, use the Services (“Aggregate Information”). Some of this information is derived from Personal Information. This statistical information is not Personal Information and cannot be tied back to you, your Account or your web browser.

How, and With Whom, Is My Information Shared?

The Services are designed to help you share information with others. As a result, some of the information generated through the Services is shared publicly or with third parties.

Information You Elect to Share:

The Personal Information you provide to us is used to match you with appropriate potential employers. As a result, the Personal Information you provide is entered into a database that is searchable by employers who have decided to use our Services. In the event that an employer determines it wishes to contact you, that employer can use the Personal Information you provided to us to contact you directly.

As mentioned above, this privacy policy does not apply to employers or other Third Party Services, and we do not control how Third Party Services use or disclose your Personal Information. Individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge, and search engines may index that information. Because of this, despite commercially reasonable efforts, we cannot guarantee the privacy of Personal Information submitted by you. Also note that if you exchange messages with a potential employer to whom you were introduced through us, such employer may retain the message history after you terminate communications and/or close your Account on the Services. We therefore urge you to think carefully about including any specific information you may deem private before you submit it through the Services or in correspondence with Third Party Services. We are not responsible for the privacy policies and/or practices of Third Party Services, and you are responsible for reading and understanding those Third Party Services' privacy policies. This Privacy Policy only governs information collected on the Services.

IP Address Information:

While we collect and store IP address information, that information is not made public. We do at times, however, share this information with our partners, service providers and other persons with whom we conduct business, and as otherwise specified in this Privacy Policy.

Aggregate Information:

We share Aggregate Information with our partners, service providers and other persons with whom we conduct business. We share this type of statistical data so that our partners can understand how and how often people use our Services and their services or websites, which facilitates improving both their services and how our Services interface with them. In addition, these third parties may share with us non-private, aggregated or otherwise non Personal Information about you that they have independently developed or acquired.

Email Communications with Us:

As part of the Services, you may occasionally receive email and other communications from us, such as communications relating to your Account. Communications relating to your Account will only be sent for purposes important to the Services, such as password recovery.

User Profile Information:

User profile information including your username and other information you enter may be displayed to other users to facilitate user interaction within the Services.

Information Shared with Our Agents:

We employ and contract with people and other entities that perform certain tasks on our behalf and who are under our control (our "Agents"). We may need to share Personal Information with our Agents in order to provide products or services to you. Unless we tell you differently, our Agents do not have any right to use Personal Information or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of Personal Information with our Agents.

Information Disclosed Pursuant to Business Transfers:

In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

Information Disclosed for Our Protection and the Protection of Others:

We also reserve the right to access, read, preserve, and disclose any information as we reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request, (ii) enforce this Privacy Policy and our Terms of Service, including investigation of potential violations hereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, (iv) respond to user support requests, or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

Information We Share With Your Consent:

Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and will be able to prevent the sharing of this information.

Security of Shared Personal Information

We require all third parties to respect the security of your Personal Information and to treat it in accordance with the law. We do not allow our Agents to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

Where third parties are processing Personal Information on our behalf, they will be required to agree, by contract or otherwise, to process Personal Information in accordance with applicable law. This contract will stipulate, among other things, that the third party and its representative shall act only on our instructions, or as permitted by law.

Is Information About Me Secure?

Your Account information will be protected by a password for your privacy and security. You need to prevent unauthorized access to your Account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer and browser by signing off after you have finished accessing your Account.

We seek to protect Account information to ensure that it is kept private; however, we cannot guarantee the security of any Account information. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

We otherwise store all of our information, including your IP address information, using industry-standard techniques. We do not guarantee or warrant that such techniques will prevent unauthorized access to information about you that we store, Personal Information or otherwise.

What Information of Mine Can I Access?

If you are a registered user, you can access information associated with your Account by logging into the Services. Registered and unregistered users can access and delete cookies through their web browser settings.

Californian Privacy Rights

Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: RippleMatch Inc., 120 E. 23rd St, New York, NY 10010 or info@ripplematch.com.

European Residents

If you are based in the EU, we will only process your Personal Information for a purpose described in this Privacy Policy if:

- you have provided your consent (which can be withdrawn at any time);
- the processing is necessary for the performance of a contract we are about to enter into or have entered into with you;
- we are required by law to undertake such processing; or
- the processing is necessary for the purposes of our legitimate commercial interests (except where such interests are overridden by your rights and interests).

If you are based in the EU, in certain circumstances you have rights under data protection laws in relation to your Personal Information that we hold about you—specifically to:

- Request access to your Personal Information. You may have the right to request access to any Personal Information we hold about you as well as related information, including the purposes for processing the Personal Information, the recipients or categories of recipients with whom the Personal Information has been shared, where possible, the period for which the Personal Information will be stored, the source of Personal Information, and the existence of any automated decision making.
- Request correction of your Personal Information. You may have the right to obtain without undue delay the rectification of any inaccurate Personal Information we hold about you.

- Request erasure of your Personal Information. You may have the right to request that Personal Information held about you be deleted.
- Request restriction of processing your Personal Information. You may have the right to prevent or restrict processing of your Personal Information.
- Request transfer of your Personal Information. You may have the right to request transfer of your Personal Information directly to a third party where this is technically feasible.

Also, where you believe that we have not complied with our obligations under this Privacy Policy or European data protection law, you have the right to make a complaint to an EU Data Protection Authority.

You can exercise any of these rights by emailing us at info@ripplematch.com.

How Can I Delete My Account?

Should you ever decide to delete your Account, you may do so by emailing info@ripplematch.com. If you terminate your Account, any association between your Account and information we store will no longer be accessible through your Account. However, given the nature of sharing on the Services, any public activity on your Account prior to deletion will remain stored on our servers and will remain accessible to the public, subject to applicable law.

What Choices Do I Have Regarding My Information?

- You can use many of the features of the Services without registering, thereby limiting the type of information that we collect.
- You can always opt not to disclose certain information to us, even though it may be needed to take advantage of some of our features.
- You can delete your Account. Please note that we will need to verify that you have the authority to delete the Account, and activity generated prior to deletion will remain stored by us and may be publicly accessible, subject to applicable law.

What Happens When There Are Changes to this Privacy Policy?

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we collect or use information, we will notify you by posting an announcement on the Services or sending you an email. A user is bound by any changes to the Privacy Policy when he or she uses the Services after such changes have been first posted.

International Transfers

We are headquartered in the United States. Please be advised that your information will be accessed by us or transferred to us in the United States or to our affiliates, partners, or service providers who are located worldwide. If you are visiting our Site from outside the United States, be aware that your information will be transferred to, stored, and processed in the United States where our servers are located, and our central database is operated and where laws regarding processing of Personal Information may be less stringent than the laws in your country. If you have concerns about our processing of your Personal Information, please do not use the Services.

Where Personal Information is transferred from the EU to a third party located in a country that has not received an adequacy decision by the European Commission, we rely on appropriate safeguards, such as the European Commission-approved Standard Contractual Clauses and EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, to transfer the Personal Information.

What If I Have Questions or Concerns?

If you have any questions or concerns regarding privacy using the Services, or if you wish to exercise any of the rights relevant to you listed above, please send us a detailed message to info@ripplematch.com or RippleMatch Inc., 120 E. 23rd St, New York, NY 10010. We will make every effort to resolve your concerns.

Effective Date: January 2019