

## Privacy Policy & Cookies

### 1. Our Policy:

- 1.1 This privacy policy (“**Privacy Policy**”) sets out the basis on which Personal Data collected from you (“**you**” or “**your**”), such as when you are a visitor of our Site, or that you provide to us, will be stored, used, disclosed and otherwise processed by Tapestry Networks, Inc. (“**Tapestry Networks**”, “**we**”, “**us**” and/or “**our**”). **Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.**
- 1.2 Our web site (the “**Site**”) is operated by Tapestry Networks and has been created to provide information about our company to our Site visitors. Tapestry Networks was established with the purpose of bringing together leaders to address critical challenges confronting them and to anticipate and influence the economic and social forces that are reshaping today’s business world (the “**Tapestry Networks Services**”).
- 1.3 As referred to in this Privacy Policy “**Personal Data**” means any information relating to an identified or identifiable natural person (a “**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person and where referred to in this policy includes special categories of personal data.
- 1.4 Tapestry Networks respects your privacy and is committed to protecting your Personal Data.

### 2. Information We Collect:

When you interact with us, either through the Site or by other means, we may collect Personal Data and other information from you, as further described below:

- 2.1 **Personal Data That You Provide or is Collected:** We collect Personal Data from you when you voluntarily provide such information, such as when you contact us via email, telephone, or postal mail with inquiries and requests to learn more about Tapestry Networks. You may also provide Personal Data to us when you meet us in person, such as at business conferences or when you are involved in our networking activities (for example, as a consultant and/or a specialist in your field). Such Personal Data may include your name, company, address, telephone number, email address, and other information we have gathered.

As explained in paragraph 3.2, we also gather Personal Data through our Site relating to your use of the Site.

**2.2 Non-Identifiable Data:** When you interact with Tapestry Networks through the Site, we receive and store certain personally non-identifiable information. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you (and is therefore not Personal Data). Tapestry Networks may store such information itself or such information may be included in databases owned and maintained by Tapestry Networks' affiliates, agents, or service providers. This Site may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, and the domain names of our visitors' Internet service providers. It is important to note that no Personal Data is available or used in this process.

**2.3 Use of Cookies:** In operating the Site, we may use "cookies" to distinguish you (as a user) from other users of the Site. This helps us to provide you with a good experience when you browse the Site and also allows us to improve the Site. A cookie is a piece of information that the computer that hosts this Site gives to your browser when you access the Site. Our cookies help provide additional functionality to the Site and help us analyze Site usage more accurately. We use cookies for the following main reasons:

- (a) *Session management:* We may use session ID cookies so that you can move easily from one page to another, and so your page requests as you move around the Site are loaded in a smooth and secure way. For the session ID cookie, once you close the browser, the cookie simply terminates.
- (b) *Analysis of the Site performance:* We may use persistent and/or tracking cookies to collect statistical information about how visitors use the Site so that we can understand how the Site works in practice and make improvements where needed. This cookie will remember that you have used the Site before so that we can identify the number of unique visitors the Site receives. A persistent cookie is a small text file stored on your hard drive for an extended period of time. Persistent cookies can be removed by following Internet browser help file directors.

In all cases in which we use cookies, we will not collect Personal Data except with your permission. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Site's features. If you would like to find out more information on the use of cookies and how to block cookies using different types of browsers, external help is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

In addition to cookies that we may place on your computer or mobile device, cookies might also be placed on your computer or mobile device by third parties that we use

to provide analytics services, including Google Analytics as described in paragraph 3.2 below. In the course of providing analytics services, such third parties could place or recognize unique cookies on your browser.

Like most standard web servers, we use log files and outside services to collect usage information. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the Site, track user's movement in the aggregate, and gather broad demographic information for aggregate use. Our objective is to monitor the quality of the user experiences on the Site.

- 2.4 **Aggregated Personal Data:** In an ongoing effort to better understand and serve the users of the Tapestry Networks Services, Tapestry Networks often conducts research on the demographics of the users of the Site or our network members, their interests and behavior based on Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and Tapestry Networks may share this aggregate data with its affiliates, agents, and business partners. This aggregate information does not identify you personally. Tapestry Networks may also disclose aggregated user statistics in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

### **3. Our Use of Your Personal Data and Other Information:**

- 3.1 Tapestry Networks uses the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use your Personal Data only in connection with the reason or purpose for which it was provided. For instance, if you contact us by e-mail, we will use the Personal Data you provide to answer your question or resolve your problem.
- 3.2 Tapestry Networks, its Corporate Affiliates (as defined below) and third parties providing services to Tapestry Networks ("**Tapestry Networks Related Companies**") may also use your Personal Data and other personally non-identifiable information collected through the Site to help us improve the content and functionality of the Site, to better understand our users and to improve the Tapestry Networks Services. Tapestry Networks Related Companies may use this information to contact you in the future to tell you about services we believe will be of interest to you. If we do so, each communication we send you will contain instructions permitting you to "opt-out" of receiving future communications. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, please contact us as indicated in paragraph 13 below or follow such other instructions we may provide, including in any communication from us.

Tapestry Networks uses **Google Analytics** to gather information from the Site (including to help analyze how users use the Site). Google may place cookies on your computer or mobile device. If you would like to disable Google's "third party" cookies, you may be able to turn them off by going to Google's website. For further information about how

information is collected and processed through Google Analytics, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

- 3.3 If Tapestry Networks intends to use any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Data is collected.
- 3.4 Personal Data and other information you provide to Tapestry Networks will be kept by Tapestry Networks for no longer than is necessary for the purposes for which your Personal Data is processed, or otherwise as is required by applicable law. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of that Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 3.5 We may anonymize your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

#### 4. **Our Disclosure of Your Personal Data and Other Information:**

Tapestry Networks is not in the business of selling your Personal Data or other information you provide to Tapestry Networks. We consider your Personal Data, and the protection of your Personal Data, to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:

- 4.1 **Business Transfers:** We reserve the right to transfer your Personal Data to a third party in the event of a sale, merger or other transfer of all or substantially all of the assets of Tapestry Networks or any of its Corporate Affiliates (as defined below), or that portion of Tapestry Networks or any of its Corporate Affiliates to which the Tapestry Networks Services relate, or in the event that we discontinue our business or file a petition or have filed against us a petition in bankruptcy, reorganization or similar proceeding, provided that the third party agrees to adhere to the terms of this Privacy Policy.
- 4.2 **Related Companies:** We may disclose your Personal Data to our Corporate Affiliates. For purposes of this Privacy Policy: "**Corporate Affiliate**" means any person or entity which directly or indirectly controls, is controlled by or is under common control with Tapestry Networks, whether by ownership or otherwise; and "**control**" means possessing, directly or indirectly, the power to direct or cause the direction of the management, policies or operations of an entity, whether through ownership of fifty percent (50%) or more of the voting securities, by contract or otherwise. Any information relating to you that we provide to our Corporate Affiliates will be treated by those Corporate Affiliates in accordance with the terms of this Privacy Policy.

- 4.3 **Agents, Consultants and Related Third Parties:** Tapestry Networks, like many businesses, sometimes hires other companies (“**Outside Contractors**”) to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases, and processing payments. We use reasonable efforts to ensure that these Outside Contractors are capable of (1) protecting the privacy of your Personal Data consistent with this Privacy Policy, and (2) not using or disclosing your Personal Data for any purpose other than providing us with the products or services for which we contracted or as required by law.
- 4.4 **Legal Requirements:** Tapestry Networks may disclose your Personal Data if required to do so by applicable law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, including without limitation in order to comply with an applicable statute, regulation, rule or law, a subpoena, a search warrant, a court or regulatory order, lawful requests by public authorities, including to meet national security or law enforcement requirements, or other valid legal process, (ii) protect and defend the rights or property of Tapestry Networks, (iii) act in urgent circumstances to protect the personal safety of network members, users of the Site or the public, or (iv) protect against legal liability. Tapestry Networks may also disclose your Personal Data if it is necessary to enforce or apply our terms and conditions and other agreements, and in exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction. We may disclose Personal Data in special circumstances when we have reason to believe that disclosing such Personal Data is necessary to identify, contact or bring legal action against someone who may be violating a contract with us, to detect fraud, for assistance with a delinquent account, or to protect the safety and/or security of our users, the Tapestry Networks Services or the general public.
- 4.5 **Third Parties Generally:** We may provide to third parties non-personally identifiable information, including where such information is combined with similar information of other users of the Site. For example, we might inform third parties regarding the number of unique users who use the Site or the demographic breakdown of our users of the Site. If you opt in, we may also provide to third parties Personal Data. In addition to the above, when users use our Site, third parties (including without limitation third-party analytics service providers and commercial partners) may directly collect Personal Data and non-personally identifiable information about our users’ online activities over time and across different websites. The third parties to which we may provide or who may independently directly collect Personal Data and non-personally identifiable information may include providers of analytics services (including vendors and website tracking services), merchants, affiliates and other actual or potential commercial partners, sponsors, licensees, researchers and other similar parties.

5. **Your Choices:**

You can use the Site without providing any Personal Data. If you choose not to provide any Personal Data, you may not be able to use certain Tapestry Networks Services.

6. **Children and Their Use of the Site:**

Tapestry Networks does not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not submit any Personal Data through the Site. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data on this Site without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to Tapestry Networks through this Site, please contact us, and we will delete that information from our databases.

7. **Links to Other Web Sites:**

This Privacy Policy only applies to how Tapestry Networks treats Personal Data and does not extend to cover other web sites maintained by third parties (the “**Third Party Sites**”). The policies and procedures we described here do not apply to the Third Party Sites. The links from this Site do not imply that Tapestry Networks endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

8. **Security:**

Tapestry Networks takes reasonable steps to protect the Personal Data provided to it from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from this Site may not be secure. Therefore, you should take special care in deciding what information you send to us via e-mail. Please keep this in mind when disclosing any Personal Data to Tapestry Networks via the Internet.

9. **Other Terms and Conditions:**

Your access to and use of this Site is subject to the **Terms of Use**.

10. **Changes to Tapestry Networks’ Privacy Policy:**

Our business and the Site may change from time to time. As a result, at times it may be necessary for Tapestry Networks to make changes to this Privacy Policy. Tapestry Networks reserves the right to update or modify this Privacy Policy from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated at the bottom of this policy.

Unless your specific consent is required, which we will seek from you, your continued interaction with Tapestry Networks or your use of the Site after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

11 **Personal Data of EEA Data Subjects:**

The following provisions shall apply to any and all Personal Data which we collect from you, or that you provide to us, if you are a data subject in the European Economic Area (the “**EEA**”):

- 11.1 We will only use your Personal Data to the extent that the law allows us to do so. Under the General Data Protection Regulation (the “**GDPR**”) we will rely on the following legal bases for processing your Personal Data:
  - (a) where it is necessary to perform a contract we have entered into or are about to enter into with you;
  - (b) where it is necessary for the purposes of our legitimate interests (or those of a third party) and your interests or fundamental rights and freedoms do not override those interests. Our legitimate interest means our interest in conducting and managing our business, including enabling us to provide you and our other users or network members with the best services we can and the best and most secure experience when dealing with us. In assessing our legitimate interests, we make sure we consider and balance any potential impact (both positive and negative) on you, others and your rights; and
  - (c) where you have given us your consent.
- 11.2 We may share your Personal Data with Tapestry Networks Related Companies and other third parties as described in this Privacy Policy. If this involves transferring your Personal Data outside the EEA, unless the transfer is necessary for the performance of a contract between you and us (or to implement pre-contract measures at your request), we will obtain your explicit consent to the transfer or we will ensure protection is afforded to your Personal Data by ensuring at least one of the following safeguards or derogations is implemented:
  - (a) we may transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission;
  - (b) we may use model contracts and/or clauses approved by the European Commission which give Personal Data the same protection it has in the EEA;
  - (c) where we transfer Personal Data to third parties in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to Personal Data shared between Europe and the US; or
  - (d) where you have specifically consented to the proposed transfer; you hereby expressly grant consent to us to: (a) process and disclose your Personal Data in accordance with this Privacy Policy; (b) transfer such Personal Data throughout the world, including to the United States or other countries that do not ensure adequate protection for personal data (as determined by the European Commission); and (c) disclose such Personal Data to comply with



lawful requests by public authorities, including to meet national security or law enforcement requirements.

Please note that if you do not provide your consent to the transfer of your Personal Data outside the EEA when requested by us, as per this sub-paragraph 11.2, we may not be able to provide certain services to you.

Please contact us as indicated in paragraph 13 below if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

11.3 Under certain circumstances, you have the right to:

- (a) **request access** to your Personal Data (commonly known as a “subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- (b) **request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) **request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data in certain other circumstances, namely where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) **object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (e) **request the restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example, if you want us to establish its accuracy or the reason for processing it.
- (f) **request the transfer** of your Personal Data to you or to another person or entity. In that case we will provide to you, or to the person or entity to whom



you wish us to transfer your Personal Data, your Personal Data in a structured, commonly used, machine-readable format.

- (g) **withdraw consent at any time** where we are relying on consent to process your Personal Data. However this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
- (h) **lodge a complaint** with the applicable supervisory authority (as defined in the GDPR). If you have any complaints about the way in which we process your Personal Data please do contact us, as set out in paragraph 13 below, as we would appreciate the opportunity to resolve your complaint.

11.4 If you want to exercise any of your rights in respect of your Personal Data, please contact us using the contact details provided in paragraph 13 below.

12. **Do Not Track:** The term “Do Not Track” refers to a HTTP header offered by certain web browsers to request that websites refrain from tracking the user. We take no action in response to automated Do Not Track requests. However, if you wish to stop such tracking, please contact us with your request, using our contact details provided in paragraph 13 below.

13. **Access to Information; Contacting Tapestry Networks:**

13.1 To keep your Personal Data accurate, current, and complete, please contact us as specified below. We will take reasonable steps to update or correct any of your Personal Data in our possession.

13.2 Please also feel free to contact us if you have any questions about Tapestry Networks’ Privacy Policy or our information practices.

13.3 You may contact us as follows:

Email: [info@TapestryNetworks.com](mailto:info@TapestryNetworks.com)

Phone: +1 781 290 2270

Fax: +1 781 290 2271

Address: 1050 Winter Street, Suite 225, Waltham, Massachusetts, 02451, USA

*This Privacy Policy was last updated on, and is effective as of, August 20, 2018*