

Swarm Vision Privacy Policy

Effective Nov. 27, 2018

Your privacy is very important to us. At Swarm Vision we have a few fundamental principles that we follow:

- We don't ask you for personal information unless we truly need it.
- We don't share your personal information with anyone except to comply with the law, develop our products, or protect our rights.
- We don't store personal information on our servers unless required for the on-going operation of our site.

Swarm Vision Inc. ("Swarm Vision" "Company" or "We") operates several websites including swarmvision.com, training.swarmvision.com, and community.swarmvision.com. It is Swarm Vision's policy to respect your privacy regarding any information we may collect while operating our websites.

Website Visitors

Like most website operators, Swarm Vision collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Swarm Vision's purpose in collecting non-personally identifying information is to better understand how Swarm Vision's visitors use its website. From time to time, Swarm Vision may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.

Swarm Vision also collects potentially personally-identifying information like Internet Protocol (IP) addresses for logged in users and for users leaving comments on our blogs. Swarm Vision only discloses logged in user and commenter IP addresses under the same circumstances that it uses and discloses personally-identifying information as described below, except that blog commenter IP addresses are visible and disclosed to the administrators of the blog where the comment was left.

Gathering of Personally-Identifying Information

Certain visitors to Swarm Vision's websites choose to interact with Swarm Vision in ways that require Swarm Vision to gather personally-identifying information. The amount and type of information that Swarm Vision gathers depends on the nature of the interaction. For example, we ask visitors who comment on our blog to provide a username and email address. For those who wish to receive Swarm Vision updates via email, we collect their emails. In each case, Swarm Vision collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with Swarm Vision. Swarm Vision does not disclose personally-identifying information other than as described below. And visitors can

always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.

Aggregated Statistics

Swarm Vision may collect statistics about the behavior of visitors to its websites. For instance, Swarm Vision may monitor the most popular pages or use spam screening services to help identify spam. Swarm Vision may display this information publicly or provide it to others. However, Swarm Vision does not disclose personally-identifying information other than as described below.

Protection of Certain Personally-Identifying Information

Swarm Vision discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors and affiliated organizations that (i) need to know that information in order to process it on Swarm Vision's behalf or to provide services available at Swarm Vision's websites, and (ii) that have agreed not to disclose it to others. Some of those employees, contractors and affiliated organizations may be located outside of your home country; by using Swarm Vision's websites, you consent to the transfer of such information to them. Swarm Vision will not rent or sell potentially personally-identifying and personally-identifying information to anyone. Other than to its employees, contractors and affiliated organizations, as described above, Swarm Vision discloses potentially personally-identifying and personally-identifying information only in response to a subpoena, court order or other governmental request, or when Swarm Vision believes in good faith that disclosure is reasonably necessary to protect the property or rights of Swarm Vision, third parties or the public at large. If you are a registered user of a Swarm Vision website and have supplied your email address, Swarm Vision may occasionally send you an email to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with Swarm Vision and our products. We primarily use our various product blogs to communicate this type of information, so we expect to keep this type of email to a minimum. If you send us a request (for example via a support email or via one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users. Swarm Vision takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information.

Cookies

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Swarm Vision uses cookies to help Swarm Vision identify and track visitors, their usage of Swarm Vision website, and their website access preferences. Swarm Vision visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Swarm Vision's websites, with the drawback

that certain features of Swarm Vision's websites may not function properly without the aid of cookies.

Business Transfers

If Swarm Vision, or substantially all of its assets were acquired, or in the unlikely event that Swarm Vision goes out of business or enters 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 Swarm Vision may continue to use your personal information as set forth in this policy.

Ads

Ads appearing on any of our websites may be delivered to users by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by Swarm Vision and does not cover the use of cookies by any advertisers.

Comments

Comments and other content submitted to anti-spam services are not saved on our servers unless they were marked as false positives, in which case we store them long enough to use them to improve the service to avoid future false positives.

Swarm Vision Privacy Shield Statement

Swarm Vision complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland transferred to the United States pursuant to Privacy Shield. Swarm Vision has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

This Privacy Shield Statement outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it and the notice and choice affected individuals have regarding our use of and

their ability to correct that information. This privacy policy applies to all personal information received by the Company whether in electronic, paper or verbal format.

“Personal Information” or “Information” means information that (1) is transferred from the EU or Switzerland to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual.

Swarm Vision is a Controller as defined by the European Commission (a person or organization which, alone or jointly with others, determines the purposes and means of the processing of personal data.)

You can read more about our data handling practices in our main privacy policy above.

Purpose: We collect Information for the purpose of generating your Innovation Profile, displaying individual and aggregated Swarm Innovation Profiles for an Employer, and for providing Swarm Innovation Training.

Onward Transfer and Choice: Swarm Vision may share Information with third parties as necessary, such as for website hosting, Innovation Profiler survey processing, and for delivery of Swarm Innovation training. We will share your Information such as your Innovation Profile or your Innovation Training progress and responses, with your Employer. You may read more about how we share information in our main privacy policy above.

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to admin@swarmvision.com.

Swarm Vision's accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, Swarm Vision remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless Swarm Vision proves that it is not responsible for the event giving rise to the damage.

Data Security: Swarm Vision shall take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Company has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Company cannot guarantee the security of Information on or transmitted via the Internet.

Data Integrity and Purpose Limitation: Company shall only process Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual.

To the extent necessary for those purposes, Company shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

Access: Pursuant to the Privacy Shield Frameworks, EU and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated. Individuals may not amend their Innovation Profiler assessments or Swarm Innovation Training responses once a page has been submitted. We maintain a record of each user's acceptance of our IP policy which prohibits any user from copying, altering or reverse-engineering our software or content. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to admin@swrmvision.com. If requested to remove data, we will respond within a reasonable timeframe.

Verification, Enforcement, and Recourse: Company uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, Swarm Vision is subject to the regulatory and enforcement powers of the U.S. Federal Trade Commission.

In compliance with the Privacy Shield Principles, Swarm Vision commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union or Swiss

individuals with inquiries or complaints regarding this privacy policy should first contact Swarm Vision at:

Swarm Vision, Inc.
PO Box 806
Los Altos CA 94023
inquiry@SwarmVision.com

Swarm Vision has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers for more information and to file a complaint. This service is provided free of charge to you.

If your complaint involves human resources data transferred to the United States from the EU and/or Switzerland in the context of the employment relationship, and Swarm Vision does not address it satisfactorily, Swarm Vision commits to cooperate with the panel established by the EU data protection authorities (DPA Panel) and/or the Swiss Federal Data Protection and Information Commissioner, as applicable and to comply with the advice given by the DPA panel and/or Commissioner, as applicable with regard to such human resources data. To pursue an unresolved human resources complaint, you should contact the state or national data protection or labor authority in the appropriate jurisdiction. Contact details for the EU data protection authorities can be found at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. Contact details for the Swiss Federal Data Protection and Information Commissioner (FDPIC) can be found at <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection--switzerland.html>. Complaints related to human resources data should not be addressed to the BBB EU PRIVACY SHIELD.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

Amendments: This privacy policy may be amended from time to time consistent with the requirements of the Privacy Shield. We will post any revised policy on this website.

Last Updated: November 27, 2018