# **FetchFind Privacy Policy**

updated July 15, 2020

#### **Definitions and abbreviations**

**LMS = Learning Management System (Thought Industries** and Teachable) - third party service provider/platform, used to deliver educational content to subscribers via an online learning platform.

**CRM = Customer Relationship Manager** (Hubspot) - a third party service provider/platform, used to manage customer service, conversational and inbound marketing, and sales relationships.

**EMP = Email Marketing Platform (Hubspot)** - a third party service provider/platform, used to send email communication to people who have opted in to the mailing list via in-person registration at such venues as conferences and tradeshows, via our social media, website, or blog registration pages, or through the use of either LMS.

**OPP = Online Payment Processor** (Stripe) - a third party service provider/platform, used to process payment for products purchased online.

**Please note:** The above may be referred to in the aggregate as "partners", "affiliates", "platforms", "third party platforms", "service providers", or "third party service providers".

GDPR = General Data Protection Regulation
CCPA = California Consumer Privacy Act

**IP = Internet Protocol** - the method or protocol by which data is sent from one computer to another on the Internet. Each computer (known as a host) on the Internet has at least one IP address that uniquely identifies it from all other computers on the Internet.

PII = Personally-Identifying Information or Personally Identifiable Information - information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.

NPII = Non-Personally-Identifying Information or Non-Personally-Identifiable
Information - information 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.

## **Please Read Carefully**

Please read this privacy notice ("Notice", "Policy", "Privacy Notice", "Privacy Policy") carefully to understand policies and practices regarding your personal data and how it will be treated. This Notice applies to individuals who interact with FetchFind or our third-party service providers (collectively, "We", "Us", "Our") as consumers, customers,

subscribers, or users (collectively, "You", "Your") of our LMS. This notice explains how your personal data/information is collected, used, and disclosed by FetchFind and third parties acting on our behalf. This privacy policy covers all online and offline data collection activities on (including but not limited to) websites, technology, learning, or subscription platforms, apps, third-party social networks, and in-person or online events.

In some cases, if you decline to provide personal data to FetchFind or our third-party service providers, including but not limited to our CRM, LMS, EMP, or OPP, we may not be able to provide you with certain online or offline goods and services. Declining to provide personal data or accept cookies may affect your user experience of our website and third-party service providers and platforms.

### **Summary**

We encourage you to regularly check for updates to this Privacy Policy, as well as the Privacy Policies of our third party service providers and partners (links above). We follow best practices for data protection and usage in accordance with GDPR and CCPA, as well as any applicable state or federal regulations.

FetchFind LLC ("FetchFind") will make every reasonable effort to protect your privacy when using our websites, LMS, CRM, EMP, and OPP, and when you have consented to receiving email or other communication from us via any of the platforms and service providers mentioned above. We ask that you help us safeguard your PII by keeping your account(s) secure.

FetchFind operates and uses the services of several websites/platforms, including http://www.fetchfind.com, http://learning.fetchfind.com, and https://www.fetchfindtraining.com. It is FetchFind's policy to respect your privacy regarding any information we may collect while operating our websites and in collaboration with any of our LMS, CRM, EMP, and OPP partners.

We are not responsible for, nor do we have any control over, the operational content of our LMS, CRM, EMP, and OPP or the protection and privacy of any information which you provide while visiting those third party service providers and platforms. We recommend that you review the privacy policies applicable to each of the websites, apps, and platforms in question.

You can opt out or update your communication preferences at any time by contacting us at hello@fetchfind.com, subject line: Update contact information. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

You can always refuse to supply PII, with the caveat that it may prevent you from engaging in certain website, learning, or subscription-related activities, such as paying for services or using our LMS.

You can request access, correction, updates or deletion of your personal information. You can object to processing of your personal information, ask to restrict processing of your personal information or request portability of your personal information. If your personal information has been collected and processed with your consent, you may withdraw that consent at any time. Withdrawing consent will not affect the lawfulness of any processing conducted prior to withdrawal, nor will it affect processing of personal information conducted in reliance on lawful processing grounds other than consent. You have the right to complain to an independent data protection authority about the collection and use of your personal information. To exercise any of these rights, please contact us at hello@fetchfind.com, subject line: Privacy. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

### **Privacy Policy Changes**

Although most changes are likely to be minor, FetchFind may occasionally and at its sole discretion change its Privacy Policy as necessary. FetchFind encourages visitors to regularly check this page for any changes to its Privacy Policy. If you have an LMS or OPP account, or are included in our CRM or EMP platforms via previous purchase, signing in to a learning management system, filling out a registration or other form, or by opting in to an email list, you should also check those sites for alerts to changes in their Privacy Policies. Your continued use of these sites after any changes in this or other Privacy Policies will constitute your acceptance of such change(s).

# Gathering of Personally-Identifying Information ("PII")

Certain visitors to FetchFind's websites choose to interact with FetchFind in ways that require FetchFind to gather potential or actual PII. The amount and type of information that FetchFind gathers depends on the nature of the interaction. For example, we ask visitors who sign up for an LMS account or request a product download such as a whitepaper or infographic to provide a name and email address. Those who engage in transactions with FetchFind are asked to provide additional information, including, as necessary, the personal and financial information required to process those transactions. In each case, FetchFind, and/or our LMS, CRM, EMP, and OPP providers collect such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with FetchFind. FetchFind does not disclose PII other than as described above. Visitors can always refuse to supply PII, with the caveat that it may prevent them from

engaging in certain website-related activities, such as paying for services or using our LMS.

### **Protection of Certain Personally-Identifying Information**

FetchFind discloses potential or actual PII only to those of its employees, contractors, and affiliated organizations that (i) need to know that information in order to process it on FetchFind's behalf or to provide services available at FetchFind'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 FetchFind's websites, you consent to the transfer of such information to them. FetchFind will not rent or sell PII to anyone. Other than to its employees, contractors, and affiliated organizations and service providers, as described above, FetchFind discloses PII only when required to do so by law, or when FetchFind believes in good faith that disclosure is reasonably necessary to protect the property or rights of FetchFind, third parties, or the public at large. If you are a registered user of a FetchFind website, LMS provider, or OPP and have supplied your email address, FetchFind may send you emails (including weekly newsletters or other forms of electronic communication) to tell you about new features, solicit your feedback, or keep you updated with what's going on with FetchFind and our products. If you send us a request (for example via a support email or a feedback mechanism such as our customer service chat function), we reserve the right to publish it in order to help us clarify or respond to your request or help us support other users. FetchFind takes all measures reasonably necessary to protect against the unauthorized access, use, alteration, or destruction of PII and NPII.

### **Website Visitors**

Like most website operators, FetchFind collects NPII 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. FetchFind's purpose in collecting NPII is to better understand how FetchFind's visitors use its website. FetchFind may occasionally release NPII in the aggregate, e.g., by providing analytics to a third party or consultant to identify usage trends and areas for improvement. FetchFind also collects PII like IP addresses for logged in users and for users leaving comments on our sites. FetchFind only discloses logged in user and commenter IP addresses under the same circumstances that it uses and discloses PII as described above, except that blog commenter IP addresses are visible and disclosed to the administrators of the blog where the comment was left.

### **Aggregated Statistics**

FetchFind may collect statistics about the behavior of visitors to its websites. For instance, FetchFind may monitor visits to our site(s) or user behavior on its LMS. FetchFind may display this aggregate information publicly or provide it to others. However, FetchFind does not disclose PII other than as described above.

### **Age Restrictions**

You must be at least 18 years old to use the FetchFind website, LMS, CRM, EMS, or OPP, or, if you are between the ages of 13 and 18, you must have your parent or guardian's permission to use these websites and platforms. By using our website or platforms, you are telling us by your actions that you have obtained that permission (you are 'representing' and 'warranting' that you have obtained the appropriate permissions to use our website or platforms). If you are under the age of 13 you may not use our website or platforms in any manner.

### Cookies

A "cookie" is a small text file or 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 to make the user experience more efficient. FetchFind and its third party platforms and service providers use cookies to help FetchFind identify and track visitors, their usage of FetchFind's websites, LMS, CRM, EMP, and OPP platforms, and their website access preferences. FetchFind visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using FetchFind's websites and third party service providers, with the drawback that certain features of FetchFind's websites and affiliated third party platforms and service providers may not function properly without the aid of cookies.

FetchFind's websites use different types of cookies, some of which are placed by third party service providers that appear on our pages. These cookies are used to personalise content, to provide social media features and customer service, and to analyse our traffic. We also share information about your use of our site with our LMS, CRM, EMP, OPP, and/or analytics service providers or partners who may combine it with other information that you've provided to them or that they've independently collected from your use of their services. Although most web browsers automatically accept cookies, some browsers' settings can be modified to decline cookies or alert you when a website is attempting to place a cookie on your computer. However, the website or third-party platforms may not function properly if you disable cookies. Users can opt-out of cookies by utilizing the settings provided in their browsers.

The cookies currently in use on FetchFind are listed below:

### Category: Necessary (2)

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

COOKIE NAME PROVIDER TYPE EXPIRY

CookieConsent fetchfind.com HTTP 1 year

First found URL: <a href="https://www.fetchfind.com/wp-login.php">https://www.fetchfind.com/wp-login.php</a>

Cookie purpose description: Stores the user's cookie consent state for the current domain

Initiator: Script tag Source: notinstalled

Data is sent to: Ireland (adequate) | Adequate country under GDPR (EU)

wordpress\_test\_cookie fetchfind.com HTTP Session

First found URL: <a href="https://www.fetchfind.com/wp-login.php">https://www.fetchfind.com/wp-login.php</a>

Cookie purpose description: Used to check if the user's browser supports cookies.

Initiator: Webserver Source: fetchfind.com

Data is sent to: United States (adequate) | Adequate country under GDPR (EU)

#### Category: Preferences (1)

Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.

COOKIE NAME PROVIDER TYPE EXPIRY

messagesUtk fetchfind.com HTTP 1 year

First found URL: <a href="https://www.fetchfind.com/">https://www.fetchfind.com/</a>

Cookie purpose description: Stores a unique ID string for each chat-box session. This allows the website-support to see previous issues and reconnect with the previous supporter.

Initiator: Script tag, page source line number 631 Source: https://js.hs-scripts.com/502161.js

Data is sent to: United States (adequate) | Adequate country under GDPR (EU)

### Category: Statistics (3)

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

COOKIE NAME PROVIDER TYPE EXPIRY

\_ga fetchfind.com HTTP 2 years

First found URL: https://www.fetchfind.com/

Cookie purpose description: Registers a unique ID that is used to generate statistical data on how the visitor uses the website.

Initiator: Page source line number 78

Source: Inline script

Data is sent to: United States (adequate) | Adequate country under GDPR (EU)

\_gat fetchfind.com HTTP 1 day

First found URL: https://www.fetchfind.com/

Cookie purpose description: Used by Google Analytics to throttle request rate

Initiator: Page source line number 78

Source: Inline script

Data is sent to: United States (adequate) | Adequate country under GDPR (EU)

\_gid fetchfind.com HTTP 1 day

First found URL: https://www.fetchfind.com/

Cookie purpose description: Registers a unique ID that is used to generate statistical data on how the visitor uses the website.

Initiator: Page source line number 78

Source: Inline script

Data is sent to: United States (adequate) | Adequate country under GDPR (EU)

#### Category: Marketing (5)

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

COOKIE NAME PROVIDER TYPE EXPIRY

\_ptq.gif hubspot.com Pixel Session

First found URL: https://www.fetchfind.com/

Cookie purpose description: Sends data to the marketing platform Hubspot about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.

Initiator: Script tag, page source line number 631

Source: https://track.hubspot.com/\_ptq.gif?k=1sd=1024x768cd=24-bitcs=UTF-8ln=en-usbfp=2404856034v=1.1a=502161rcu=https%3A%2F%2Fwww.fetchfind.com%2Fr=https%3A%2F%2Fwww.fetchfind.com%2Fr=https%3A%2F%2Fwww.fetchfind.com%2Ft=FetchFindcts=1594855454024vi=a3dd11dc96b6405aecb50a56150515c8nc=truece=falsept=1 via https://js.hs-scripts.com/502161.js

Data is sent to: United States (adequate) | Adequate country under GDPR (EU)

**\_fbp** fetchfind.com HTTP 3 months

First found URL: https://www.fetchfind.com/

Cookie purpose description: Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.

Initiator: Script tag, page source line number 80

Source: https://connect.facebook.net/en\_US/fbevents.js

Data is sent to: United States (adequate) | Adequate country under GDPR (EU)

fr facebook.com HTTP 3 months

First found URL: https://www.fetchfind.com/

Cookie purpose description: Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.

Initiator: Script tag, page source line number 80

Source: https://connect.facebook.net/en\_US/fbevents.js

Data is sent to: Germany (adequate) | Adequate country under GDPR (EU)

r/collect doubleclick.net Pixel Session

First found URL: https://www.fetchfind.com/

Cookie purpose description: This cookie is used to send data to Google Analytics about the visitor's device and behavior. It tracks the visitor across devices and marketing channels.

Initiator: Inline scriptPage source line number 78

Source: <a href="https://stats.g.doubleclick.net/r/collect?v=1aip=1t=dc">https://stats.g.doubleclick.net/r/collect?v=1aip=1t=dc</a> r=3tid=UA-46392719-1cid= 1204194034.1594855160jid=78902979\_gid=1762036042.1594855160gjid=194137887\_v=j83z=108 2696799

Data is sent to: United States (adequate) | Adequate country under GDPR (EU)

tr facebook.com Pixel Session

First found URL: <a href="https://www.fetchfind.com/">https://www.fetchfind.com/</a>

Cookie purpose description: Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.

Initiator: Script tag, page source line number 80

Source:

 $https://www.facebook.com/tr/?id=452761131807028ev=PageViewdl=https%3A%2F%2Fwww.fetchfind.com%2Frl=https%3A%2F%2Fwww.fetchfind.com%2Fif=falsets=1594855177175sw=1024sh=768v=2.9.22r=stableec=0o=286fbp=fb.1.1594855177174.588705498it=1594855176749coo=falserqm=GETvia https://connect.facebook.net/en_US/fbevents.js$ 

Data is sent to: Germany (adequate) | Adequate country under GDPR (EU)