# **Privacy Policy**

Effective as of January 18, 2021.

This Privacy Policy describes how we handle personal information that we collect through our website <a href="https://www.getpequity.com/">https://www.getpequity.com/</a> and any other website that we own or control and which posts to this Privacy Policy.

Our services are designed for businesses and are not intended for personal or household use. Accordingly, we treat all personal information covered by this Privacy Policy, including information about any visitors to our website, as pertaining to individuals acting as business representatives, rather than in their personal capacity.

Pequity is a software provider for our employer-customers. Pequity's customers have their own policies regarding the collection, use and disclosure of their employees' personal information, and Pequity is not responsible for our customers' handling of such information. Pequity's handling of our customers' employee data is governed by service agreements with our employer-customers. To learn about how a particular customer handles personal information, we encourage you to read the customer's privacy statement or contact the customer directly.

#### What we do

Pequity is on a mission to simplify the complex and time-consuming process of building a competitive, scalable, and equitable compensation program. We use industry best practice and a data-backed approach to enable companies to make better pay decisions and decomplicate the compensation process.

### Personal information we collect

**Information you provide to us.** Personal information you may provide to us through our services or otherwise may include:

- **Contact details,** such as your first and last name, business email, and phone number. **Communications** that we exchange with you, including when you contact us with questions, feedback, to request a demo, or otherwise.
- **Registration information**, such as information related to a product or an event for which you register.

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• Transactional information, such as your preferences for receiving communications about our activities, events, and publications as well as details about how you engage with us. • Other data not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Automatic data collection.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with our website, our communications and other online services, such as:

• **Device data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier,



- radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state or geographic area.
- Online activity data, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to our services, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.

Cookies and similar technologies. Like many online services, we use the following technologies:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.
- Local storage technologies, like HTML5 and Flash, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
  - **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

# How we use your personal information

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

**Service delivery.** We use your personal information to:

- Provide information about our products and services;
- Operate and improve our service, provide support, and communicate with you about our services, including by sending announcements, updates, security alerts, and support and administrative messages;
- Communicate with you about events in which you participate;
- Understand your needs and interests, and personalize your experience with our services and our communications; and
- Provide support for our services, respond to your requests, questions and feedback.

**Research and development.** We may create aggregated, de-identified or other anonymous data from personal information we collect for product research and development purposes. We make personal information into anonymous data by removing information that makes the data personally identifiable to you.

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**Compliance and protection.** We may use your personal information to:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- Audit our internal processes for compliance with legal and contractual requirements and internal policies;
- Enforce the terms and conditions that govern our services; and
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal



activity, including cyberattacks and identity theft.

# How we share your personal information

We may share your personal information with:

**Service providers.** Companies and individuals that provide services on our behalf or help us operate our services or our business (such as hosting, professional services, information technology, payment processors, customer support, email delivery, and website analytics services).

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the <u>compliance and protection purposes</u> described above.

**Business transferees.** Acquirers and other relevant participants in business transactions (or negotiations for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Pequity or our affiliates (including, in connection with a bankruptcy or similar proceedings).

### Your choices

You have the following choices with respect to your personal information.

**Cookies.** Most browser settings let you delete and reject cookies placed by websites. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, you may not be able to use all functionality of our services and it may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>.

**Local storage.** You may be able to limit use of HTML5 cookies in your browser settings. Unlike other cookies, Flash-based local storage cannot be removed or rejected via your browser settings, but you can adjust the settings of your Flash player to block it. Blocking Flash storage may impede the functionality of Flash applications, including those employed by our services. For more information on Flash local storage visit <a href="https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html">https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html</a>.

**Opt out of marketing communications.** You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us at pup@getpequity.com.

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**Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <a href="http://www.allaboutdnt.com">http://www.allaboutdnt.com</a>.

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory or later request that we delete it, we may not be able to provide those services.

### Other sites and services



We may offer links to websites and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites or online services operated by third parties, and we are not responsible for their actions.

## Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe and we cannot guarantee the security of your personal information.

### International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

### Children

Our services are not intended for use by children under 13 years of age. If we learn that we have collected personal information through our services from a child under 13 without the consent of the child's parent or guardian as required by law, we will delete it.

# **Changes to this Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on our website. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through our services. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of our services after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

### How to contact us

You can reach us by email at <a href="mailto:pup@getpequity.com">pup@getpequity.com</a>.

