



# **e180 Privacy Policy**



July 2018



**We are e180, the creators of Braindate. We care deeply about protecting your personal information, so we've outlined everything you need to know about it here.**

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## **Introduction**

e180 is a company that fosters collaborative learning in all kinds of environments. Our intention is to help you identify your own experiences and expertise, so that you can share it with others who are seeking the kind of insight that you have to offer. We've built Braindate, a web app, to help you navigate the knowledge of other participants at an event, or to share knowledge with your peers in an organization or community that you belong to. Our intention is always to help support you in your learning journey, and to bring you closer to those who can help you along the way.

We care about protecting your privacy and making e180 (“e180,” “we” or “us”) a service that you feel you can trust. Since our goal is to help people meaningfully connect with each other, it's especially important to us that you feel safe and secure when you're using our services. This privacy policy (“Privacy Policy”) outlines how we use and disclose the personally identifiable information (“Personal Information”) and other information that we collect when you use our Services (defined below). This applies to e180, the website (<https://www.e180.co>) and all related sites, our web app [Braindate](#), and other services provided by us and on which a link to this Privacy Policy is displayed, and all other communications with individuals from written or oral means, such as email or phone (collectively, together with the Site, our “Service.”).

In this Privacy Policy, we use the terms "e180", to refer to E-180 Inc. the operator of the website located at [www.e180.co](http://www.e180.co) (the “Site”) and the mobile application (the “Mobile Application”) through which the e180 services are provided (“Services”).

We wrote this policy to help you understand exactly what information we use to help us accomplish this. Whether you're here to learn more about your personal information and its relationship to e180 as a whole or just to Braindate, this policy is meant for you. If you have any questions about the nitty-gritty, please email [privacy@e180.co](mailto:privacy@e180.co) whenever you'd like. We'd be happy to hear from you.



## **Part 1. What is personal data, and what is consent?**

“Personal data” are any information relating to an identified or identifiable “natural person” -- in other words, someone who can be identified, directly or indirectly, based on either an identification number or factors specific to this person’s mental, economic, cultural, physical, physiological, or social identity. Personal data may include things like name, email address and telephone number. Personal data also includes information about hobbies, memberships or websites viewed by someone else.

We will only ever collect, use and/or pass on personal data if this is permitted by law or if the user explicitly consents to the data processing.

Consent is any voluntary declaration or other unambiguous affirmative action concerning a specific case and given in an informed and unambiguous manner, with which the data subject indicates that he/she agrees to the processing of his/her personal data.

## **Part 2. What information do we collect, why do we we collect it, and how do we collect it?**

### **What information do we collect?**

#### **Basic Personal Data**

We collect information from you when you log into our service and voluntarily provide us with your information, and when you choose to sign up for our communications. This information may include your name, email, and phone number.

We also collect your email and name when you provide it to us when signing up for our newsletter, or when you submit your own name and contact information when filling out our website’s information request form (run through Wordpress.com).

#### **Qualitative Behavior**

While you’re at an event that is using Braindate, the event organizers and/or Braindate staff may record the braindate topics that you post to help them better understand what their participants are interested in and talking about; to share your topics to help you connect with other event participants; and to use certain Braindate topics and attribute them to you as examples of available braindate topics that other participants can book.

#### **Device information**

We may collect information about the device you’re using when you’re on our website, including type of device, operating system, settings, unique device identifiers and crash data that helps us understand when something breaks. The amount and type of information that we collect changes depending on the type of device you’re using. To learn more about what information



your device makes available to us, please also check the policies of your device manufacturer or software provider.

## **Why do we collect this information?**

On the Braindate app, we need this information to simply create your Braindate profile for you and log you in to the app. When you're using Braindate at an event, we need to restrict access to that event-specific version of the Braindate to exclusively registered event attendees. This means that we use the email with which you registered to the event as verification of your identity when you create your Braindate profile. In other words, we need to cross-reference the email with which you provide us with your participant ID email in order to validate that it's really you: the event participant whose ticket grants them special access to use Braindate.

For our newsletter, we need to collect your basic contact information in order to deliver the newsletter to you. We also collect basic information about your user activity to monitor and optimize the user experience of our website.

In terms of qualitative behavior, as registrants of the same event, you permit the event organizers and/or e180 staff to share your Braindate topics and attribute them to you within a group of other event participants in order to provide examples of relevant and/or available braindate topics; to demonstrate exemplary platform behaviour; and to encourage others to engage with the Braindate platform

## **How do we collect this information?**

- **Braindate**: When you log into Braindate, you give us some information voluntarily: your name and your email address. If you choose to opt-in to phone notifications by SMS, then you give us your phone number as well. We will use your email and phone number strictly to send you notifications by email and SMS respectively, related to your activity on the Braindate platform.
- **e180 newsletter**: When you sign up for our newsletter, you give us your email address and name.
- **Additional Data Collection**: We also collect and store only the personal information that you choose to submit to us through our Site or Mobile Application. This includes any Personal Information, such as your name, email address, job title and company that you use to fill out your Braindate profile. You may also provide us other information about your interests. By voluntarily providing us with your Personal Information, you are consenting to our use of it in accordance with this Privacy Policy.

We use different technologies to collect information from your device and about your activities on our Site or Mobile Application:



**Web Logs:** We automatically collect information from your browser or device when you visit our Site or use our Mobile Application. This information could include your IP address, device ID, your browser type and language, access times, the content of any undeleted cookies that your browser previously accepted from us and the referring website address.

**Cookies:** When you visit our Site, we may assign your computer one or more cookies, to facilitate access to our site and to personalize your online experience. Through the use of a cookie, we also may automatically collect information about your online activity on our Site, such as the web pages you visit, the time and date of your visits, the links you click, and the searches you conduct on our Site. We use this information to help us understand user behaviour on the site, so that we're sure to present a relevant and up-to-date experience for you. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. However, if you choose to decline cookies you may not be able to use some of the interactive features offered on our Site. **No personally identifiable information is contained in these cookies.**

**Web Beacons:** We may use standard Internet technology, such as web beacons and other similar technologies, to track your use of our Site so that we can optimize the user experience of our website. We also may include web beacons in email messages to determine whether messages have been opened and acted upon - also to help us ensure that the content we are sharing with you is relevant and timely. The information we obtain in this manner enables us to customize the services we offer our Site and to measure the overall effectiveness of our Services.

**Social Media:** You may choose to connect our Service to your other social network profiles providers, such as Facebook and Twitter. If you do not wish to share information from such services, you may disconnect these profiles at any time.

### **Mobile Device Additional Terms**

- *Mobile Device:* If you use a mobile device to access our Site or download any of our applications, we may collect device information (such as your mobile device ID, model and manufacturer), operating system and version information, and IP address.
- *Mobile Analytics:* We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from.

## **Part 3. How do we use the information we collect?**

We may use information that we collect about you to:



- deliver our Services;
- manage your account and provide you with customer support;
- perform research and analysis about the user experience of our Services;
- communicate with you by email in accordance with your consent preferences;
- perform website or mobile application analytics; and
- enforce or exercise any rights in our Terms of Service.

## **Part 4. How do we share your information, and what third parties might we share this information with?**

We believe that your privacy is critical. In fact, we're passionate about protecting it. We will not share your Personal Information without your prior consent except as outlined in our Privacy Policy.

**These are the only circumstances in which we may share your Personal Information:**

**Trusted Third Parties:** We may share information, including Personal Information, with our trusted third parties that perform certain services on our behalf. We select our third parties based first and foremost on their compliance with international standards of data privacy like [GDPR](#). **We only share the personal information that is essential for them to perform the service that we need in order to deliver our own service effectively.** These services may include supporting our website's functionality, providing customer service, surveys and other features offered through our Services like sending the SMS notifications that you opt-in to on the Braintree platform. These service providers may have access to personal information needed to perform their functions **but are not permitted to share or use such information for any other purposes.**

**Here is an up-to-date list of our Trusted Third Parties, who are themselves each compliant with GDPR as of May 2018:**

- Amazon Web Services (web servers, database and cache services)
- Twilio (to send SMS)
- Sendgrid (to send bulk app notification emails)
- Osedea (to handle event app integrations)

**Other Situations:** We also may disclose your information, including personal information:

- In response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; to establish or



exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.

- When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others.
- In connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.
- We also may share aggregated, non-personal, or personal information in hashed, non-human readable form, with third parties, including advisors, writers, researchers, partners, advertisers and investors for the purpose of conducting general business analysis, studies, articles, and for essays media and entertainment or other business purposes.

### **How might you share your own information with Third Parties through our Services?**

There may be several places on our Site where you may click on a link to access other Sites that do not operate under this Privacy Policy. For example, if you click on a link posted by another user on the Braindate platform, you may be taken to a website that we do not control. These third-party websites may independently solicit and collect information, including personal information, from you. We recommend that you consult the privacy statements of all third-party websites you visit.

## **Part 5. What can you control about your data?**

### **Erasure and Portability**

You always have the right of erasure, and the right of data portability. In other words, it is your right to have access to your own information whenever you want in an easily readable format, and to request that we delete your information from all of our platforms at any time whenever there is no longer a compelling reason for its continued processing. You can email [privacy@e180.co](mailto:privacy@e180.co) to effect this demand, and we'll take care of whatever your request is within a reasonable amount of time.

If you are a user of our Services, you can always edit or remove yourself from the Braindate platform. You can review and update your Personal Information online at any time by logging into Braindate profile and clicking on Settings. You may also delete your account at any time by visiting the "Settings" page for your account.



### **How long do we keep your information?**

Our backup servers are there to help ensure that your experience with our Services is smooth and consistent. Because of this, your Personal Information that can be removed by you under this Privacy Policy or our Terms of Service may remain on our backup servers for a reasonable time after it is deleted from our main servers.

We keep your personally identifiable information only so long as we need it to fulfil our duty to the entity that engaged us as a service built for you and offered to you through that entity. This is also the case for anyone that we share your information with and who carries out services on our behalf - the Third Parties that we outlined above, without which we couldn't execute Braindate. When we no longer need to use your information to provide you with our service, and there is no need for us to keep it to comply with our legal or regulatory obligations, we'll either remove it from our systems or completely anonymize the data. We would use anonymized data for statistical purposes.

## **Part 6. What measures do we take to ensure your data's security?**

We have taken all reasonable measures to ensure that our data is protected, and we verify its security internally on a regular basis with a security audit. Our data is stored securely at rest and all servers are behind a firewall to prevent any access to open ports. All data are only accessible through HTTPS connections.

In the event of a security breach, we notify our client, who controls your data, as soon as possible. They will notify you or instruct us to do so.

## **Part 7. Additional Information**

### *Changes to e180's Privacy Policy*

We may occasionally modify this Privacy Policy. When we do, we will let you know by changing the "last updated" date within this Privacy Policy, and your continued use of the Service shall indicate your agreement with the terms of the revised Privacy Policy.

### *Questions*



If you have any privacy-related questions or comments, or if our treatment of your Personal Information under this Privacy Policy bothers you, you can contact us at [privacy@e180.co](mailto:privacy@e180.co). You can also use this email address to review or correct your Personal Information.