e180 Privacy Policy

July 2022
We are e180, the creators of Braindate. We care deeply about protecting your privacy, so we’ve outlined everything you need to know about it here.

Last modified: July 2022

In its most recent iteration we modified the Privacy Policy to more clearly delineate between the privacy measures e180 takes in its capacity as i) a data controller, when alone or jointly with other entities determining the purposes and means of the processing of Personal Information, and ii) as a data processor, when processing Personal Information on behalf our data-controller Event Host clients.

Introduction

e180 (“e180” “we,” “us,” or “our”) is committed to protecting your privacy and making our products and services ones you can trust. Since it’s important to us that you feel safe and secure when using our Site and Services, we have provided this Privacy Policy that describes to you our practices regarding both the Personal Information i) that we collect from users of our Site and Services (defined below) and ii) that is provided to us by our third-party data-controller Event Host clients (“Event Hosts”). This Privacy Policy also tells you the choices you can make about how the Personal Information you provide to e180 or our Event Hosts is collected, stored, used, and disclosed.

This Privacy Policy applies to e180, the website https://www.e180.co and its sub-domains (collectively, “Site”), our web app Braindate (“Mobile Application”), and other services provided by us and to which a link to this Privacy Policy is displayed, as well as all other communications with individuals either written or oral, such as email or phone (collectively, with “Site,” “Services”).

Whether you’re here to learn more about your Personal Information and its relationship to e180 as a whole or just to Braindate this Privacy Policy is meant for you. If you have any questions about the nitty-gritty, please email privacy@e180.co whenever you’d like. We’d be happy to hear from you.

In this Privacy Policy we use the term "e180" to refer to E-180 Inc., a Canadian corporation, with offices located at 5605 Avenue de Gaspé, #805, Montreal, Quebec H2T 2A4.

Overview

e180 complies with data protection law and principles outlined in the General Data Protection Regulation (“GDPR”), as well as with country-specific data protection regulations.

For the purpose of the GDPR,


Part 1. What is Personal Information, Anonymous Data, and Consent?

“Personal Information” is any information or data relating to an identified or identifiable natural person ("data subject" or "user") – in other words, 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, cultural or social identity of that natural person.

“Anonymous Data” is data that is not associated with or linked to your Personal Information. Anonymous data does not, by itself, permit the identification of individual persons.

“Consent” of the user means any freely given, specific, informed and unambiguous indication of the user’s wishes by which they, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Information relating to themselves.

We will only ever collect, use and/or pass on Personal Information of a user if permitted by law or if the user explicitly consents to the data processing.

Part 2. What Personal Information do we collect, why do we collect it, and how do we collect it?

What information do we collect?

Basic Personal Information

As a data controller, e180 collects basic Personal Information from you such as your name, email and phone number when you log in to our Site or Services and voluntarily provide us with such information, as well as when you choose to sign up for our communications. 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 Site’s information request form.
As a data processor, we may also receive this type of basic Personal Information from the Event Host hosting an event which you have registered to attend, if they have collected such information from you by their services or applications. In such instances, as a data processor, e180 follows the instructions of the Event Host in connection with the processing of such information.

**Qualitative Behavior**

While you’re at an event that is using Braindate, where applicable, the host of the Braindate experience 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 Site, 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.

**Recorded Communications Content**

We may collect information that you consent to provide as part of your use of the Services, including recorded communications content generated in one-on-one, group, or fishbowl Braindates. Such information may include any audio, video, in-meeting messages, chat messaging content, or any files or documents users or others might upload or share. Content may contain your voice and image, depending on the Braindate recording settings of your account, the account(s) of those with whom you are Braindating, or the Event Host.

Such recorded information may be passed on to, and made downloadable for, Event Hosts and/or authorized users. Such recordings will be owned by Event Hosts.

e180 will NOT access such recorded information unless required for, and in compliance with, applicable legal, safety, or security reasons, such as the investigation of civil discovery, litigation, or other adversarial legal proceedings, and to enforce or investigate potential violations of our Terms of Service or policies.

**Why do we collect this information?**

We need this information to create a Braindate profile for you on the Braindate Mobile Application and log you in. If we have already received this information from the Event Host, we may use it to pre-populate your Braindate profile to make completion easier and quicker. When using Braindate at an event, registered event-users will be restricted to using the event-specific version of Braindate associated with their particular event. This means that,
where applicable, we use the email with which you registered to the event as verification of your identity when you create your Braindate profile. In some cases, a special code is provided instead of using email recognition in order to access the Braindate platform for a given event.

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 Site.

In terms of qualitative behavior, where applicable, by providing your Personal Information you permit the organizers of the Braindate experience 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 behavior; and to encourage others to engage with the Braindate platform.

**How do we collect this information?**

**Braindate:** When you log in to Braindate, you give us some Personal 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 only to send you notifications by email and SMS, respectively, related to your activity on the Braindate platform.

**Braindate Recording:** Some users may have permission to record or save any audio or video content, in-meeting messages, chat messaging content, or any files or documents users or others might upload or share in the course of a Braindate. However, only those users who first consent by opting in to having their information recorded will be able to participate in such recorded Braindates. If users are not presented with such an opt-in prior to any Braindate, then the Braindate is not being recorded.

**Event Hosts:** As mentioned above, we may also receive some of your Personal Information from the applicable Event Host.

**e180 Newsletter:** When you sign up for our newsletter, you give us your email address and name.

**Additional Data Collection:** We collect and store only that Personal Information which 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 provide us with when filling out your Braindate profile. You may also provide us with other information, such as 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 may include your Internet Protocol (IP) address, device ID, your browser type and language, date/time stamp of your visit, the
content of any undeleted cookies that your browser previously accepted from us, or 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 personalize your online experience. Through the use of cookies we may also automatically collect information about your online activity on our Site, such as the web pages you visit, the times and dates of your visits, the links you click, and the searches you conduct on our Site. We use this information to help us understand user behavior 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 settings to decline them. However, if you choose to decline cookies you may not be able to use some of the interactive features offered on our Site. **No Personal 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. 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 Services 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 Site 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-Party Service Providers:**

We may share information, including Personal Information, with trusted third parties that perform certain services on our behalf which are essential for the functioning of our Services. We select our third parties based first and foremost on their compliance with international standards of data privacy such as the GDPR. **We share only that Personal Information which is essential for them to perform the services that we require in order to deliver to you our own Services effectively.** Third-party services may include supporting our Site functionality; or providing customer service, surveys or other features offered through our Services, like sending SMS notifications that you can opt in to on the Braindate platform. These service providers may have access to Personal Information needed to perform their functions, but they are not permitted to share or use such information for any other purposes.

Here is a complete, up-to-date list of our Trusted Third-Party Service Providers, who are themselves compliant with the GDPR as of August 2021:

- Amazon Web Services (web servers, database and cache services)
- Twilio (to send SMS and for video calling capability)
- Sendgrid (to send app notification emails)
- Google Analytics (web analytics)
- Amplitude (user behavior data)

**Event Hosts:**

We may share information with the data-controller Event Host providing the event which you have registered to attend. For example, if you schedule a Braindate with another event participant, we may inform the applicable Event Host about this. If you use Braindate Services with an account provided by an Event Host organization you are affiliated with, such as your employer, then that organization might be able to i) control and administer your account, including privacy-related settings, or ii) access and process your information, including the qualitative and device information, as well as the recorded meeting and messaging content of the communications associated with your Braindate account.

We encourage you to review your applicable Event Host’s privacy policy to learn more about
how they handle your Personal Information in connection with the event to which you have registered to attend, including how you can exercise your data protection rights. If your organization provides you with access to our Services, your use of them is subject to your organization’s policies, if any. You should direct your privacy enquiries, including any requests to exercise your data protection rights, to your data-controlling organization’s administrator. If you have questions about e180’s operations in connection with providing our Services to your organization, please contact e180.

**Other Situations:**

We may share some of your 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 that 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.

- 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, 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 places on our Site where you can click on a link to access outside sites that are not associated with e180 and 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 policies of all third-party websites you visit.

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

Subject to certain conditions and the laws of the jurisdiction governing the processing of the Personal Information you provide to e180 or an Event Host, your rights, as provided by Chapter
3 of the GDPR, include:

- **Access:** the right to know what Personal Information of yours the data controller holds or is processing.
- **Rectification:** the right to obtain from the data controller rectification of any Personal Information of yours that is inaccurate or incomplete.
- **Erasure:** the right to have the data controller erase the Personal Information it holds about you.
- **Objection, restriction or withdrawal of consent:** the right to object to the storage of any Personal Information, or to restrict or withdraw any consent given for the collection or processing of your Personal Information.
- **Portability:** the right to obtain in an easily readable format any Personal Information of yours that you provided to a data controller.

Where e180 is the data controller, you can email privacy@e180.co to affect any such request and we will address your concern within a reasonable amount of time. All processors, insofar as it is possible, must assist their controller in responding to any such requests to which the controller is obligated to respond.

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 in to your Braindate profile and clicking on “Settings.” You may also delete your account at any time by visiting the Settings page of your account.

**Where do we store your information?**

e180 processes the information of people from across the world. We may send your information to, and your information may be stored and processed in, any country where we do business or our service providers do business, including the United States. Where Personal Information is transferred to or processed in locations which have not been determined by the European Commission to have an adequate level of data protection, we take security measures designed to provide the level of data protection in accordance with our Privacy Policy generally.

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

e180, in the capacity of either data controller or data processor, and, where applicable, its Event Host client, will keep your Personal Information for only so long as is needed to fulfill the purposes for which you provided your information. The same goes for any of our trusted third-party service providers with whom we share your information and on whom we rely to execute our Services. When we no longer need to use your Personal Information to provide you with our Services, and there is no need for us to keep it in order to comply with our legal or regulatory obligations, we will either remove it from our systems or completely anonymize the data, which we may then use for statistical purposes.
Our backup servers are there to help ensure that your experience with our Services is smooth and consistent. Because of this, the Personal Information that can be removed by you under this Privacy Policy may remain on our backup servers for a period of time as long as is reasonably necessary for our operations before it is deleted from our main servers.

Part 6. What measures do we take to ensure your data is secure?

e180 uses a selection of industry-standard security technologies and measures to ensure that the data we collect and/or process 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 is accessible only through HTTPS connections. We process data in accordance with the GDPR requirements directly applicable to the provision of our Services.

In the event of a security breach where e180 is the data controller, we will notify as soon as possible all users whose Personal Information may have been affected. In the event of a security breach where e180 is the data controller, we will notify our data-controller Event Host, and they will then either notify all users whose Personal Information may have been affected or instruct us to do so.

Part 7. Additional Information

Changes to e180's Privacy Policy

We may occasionally modify this Privacy Policy. If we do, we will let you know by posting the latest version of the Privacy Policy on our Site and by changing the "last updated" date therein. We will not change how we handle previously collected information in a way incompatible with the information in this Privacy Policy without providing notice (i.e., via the email addresses associated with your account). In the event of any update of the Privacy Policy, your continued use of our Services shall indicate your agreement with its new terms.

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. You can also use this email address to review or correct your Personal Information.

Contact

Communications sent to e180 can be addressed to:

E-180
5605 Avenue De Gaspé, Suite 106
Montréal, QC, H2T 2A4 – CANADA
We can be reached by email at privacy@e180.co.