

## **Privacy Policy**

This Privacy Policy describes how Inventit Inc. (dba InvenTrust) collects and uses personal information that you provide or that is collected by InvenTrust or its third party contractors (“Personal Information”) in connection with your access and use of the InvenTrust website (the “Site”).

### **Our Commitment to You**

While information is the cornerstone of our ability to provide superior service, our most important asset is the trust of our customers. Keeping customer Personal Information secure and in accordance with the law, is a top priority for us. Here, then, is our commitment to privacy:

We endeavor to safeguard any Personal Information that our customers share with us from unauthorized use or disclosure.

We will limit the collection and use of customer Personal Information to what we require to deliver our services; to administer, improve and carry on our business; and to comply with applicable laws and valid requests for information submitted by law enforcement, all as set out in further detail below and in our Terms of Use.

We will only use Personal Information in the manner consented to or agreed to by our customers or as otherwise required or allowed by law. Personal Information we collect may be stored in servers located in the United States of America or in other countries and, as such, may be subject to the laws of these countries. By providing Personal Information to InvenTrust or allowing for its collection pursuant to your use of the InvenTrust website, you are acknowledging and agreeing that your Personal Information may be transmitted, hosted and/or stored in the United States or America and other jurisdictions.

We will attempt to keep customer files complete, up to date, and accurate. We will tell our customers how and where to access their Personal Information

(except when prohibited by law) and how to notify us about errors which we will attempt to promptly correct.

We will only retain Personal Information for as long as it is required for the purpose for which it was collected, or as otherwise allowed or required by law. Thereafter, Personal Information may be anonymized or aggregated and/or otherwise used by us pursuant to our Terms of Use.

### **Information Collection and Use**

We may store any information you enter on our Site or give us in any other way, including through email, telephone, or other communications with us. If you contact us for support, we may keep an internal record of what support was given.

We may use your information to contact you from time to time regarding changes to our Site.

We use information gathered about you from our Site (for example, your IP address or device operating system) to help diagnose problems with our server, and to administer our Site. We also gather broad demographic information from this data to help us improve our Site.

Our Site may use cookies to identify you so you don't need to log in each time you visit our Site.

### **Security**

We follow generally accepted industry standards to protect Personal Information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

### **Sending Emails**

We use emails to communicate with you and to send information that you have requested. We also provide email links, as on our “Contact Us” page, to allow you to contact us directly.

### **Third Party Service Providers**

We may at times provide information about you to third parties to provide various services on our behalf, such as performing analyses of our services or customer demographics, and management of customer relationships and, if required by law, as agreed to by you. We will only share information about you that is necessary for the third party to provide the requested service. We will require these companies to agree that they will not retain, share, store or use your Personal Information for any purposes unrelated to the requested service.

In the event that we use third party advertising companies to serve ads on our behalf, these companies may employ cookies and other lawful means to measure advertising effectiveness.

### **Supplementation of Information**

In order to provide certain services to you, we may on occasion supplement the Personal Information you submit to us with information from third party sources (e.g., information from our strategic partners and service providers). We do this to enhance our ability to serve you and to tailor our products and services to you.

### **Targeted Advertisements**

InvenTrust may display targeted offers to our customers based on the products or services purchased by these customers in the past. We may work with third parties to facilitate the provision of these targeted offers, and consequently we may share information about you (including Personal Information) with those third parties. Any such sharing will be done in accordance with applicable laws.

### **Updating Your Information**

You may alter, update or deactivate your account information or opt out of receiving communications from us and our partners at any time. We have the following options for changing and modifying your account information or preferences:

- Send an email to: [support@inventrust.com](mailto:support@inventrust.com)
- Mail us a letter to: InvenTrust, 50 Milk Street, 16th Floor, Boston, MA 02109

We will use reasonable efforts to respond to your request for access or to modify or deactivate your information within thirty (30) days.

### **Transfer of Data Abroad**

If you are visiting this Site from a country other than the country in which our servers are located, your communications with us may result in the transfer and/or storage of information across international boundaries. By visiting and using this Site and communicating electronically with us, you consent to such transfers and storage.

### **Compliance with Laws and Law Enforcement**

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical. We will also share your information to the extent necessary to comply with ICANN's rules, regulations and policies.

To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process.

## **Changes in Our Practices**

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post the updated Privacy Policy on our Site. Your continued access of the Site use of the InvenTrust services constitutes your acceptance of the modified Privacy Policy. Furthermore, in the event that we are acquired by or merge with another company, Personal Information and other information that we have regarding you may be transferred to the company that acquires or merges with us and may be subject to different terms and conditions as a result. By accessing and using the Site, you acknowledge and agree that we may transfer Personal Information and other information in connection with such an acquisition or merger.

This Privacy Policy was last revised on June 26<sup>th</sup>, 2017.