

Privacy Policy

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This Privacy Policy informs you about how the Poppulo Customer (your employer) and Poppulo (collectively “We”) will process your personal information when you use the Poppulo Harmony App, including both mobile and web versions (collectively the “Platform”). When you use the Platform, Poppulo processes your personal information pursuant to a contract it has with and on behalf of the entity who has granted you access to the Platform (the “Poppulo Customer”). With respect to your use of the Platform, the Poppulo Customer is the controller of your personal information and Poppulo is a processor.

By accessing and using the Platform, you signify you have read and understand the terms of this Privacy Policy. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of the Platform.

We may change this Privacy Policy in response to changing legal, technical, and business developments. If We make material changes to this Privacy Policy, We will take appropriate measures to inform you in a manner that is consistent with the significance of the changes We make and in accordance with applicable law.

1. Personal Information We Collect Using the Platform

Personal information is typically data that identifies an individual or relates to an identifiable individual. This includes information you provide to the Poppulo Customer, information which is collected about you automatically, and information obtained from third parties. The definition of personal information depends on the applicable law based on your physical location. Only the definition that applies to your physical location will apply to you under this Privacy Policy. Described below are the types of personal information collected from and about you through the Platform.

- **Personal Information You or the Poppulo Customer Provide:** You or the Poppulo Customer may give Poppulo your personal information including name, company name, email address, telephone number, physical address, biographical information, and information about where you work when you use the Platform. In addition, when you send communications through the Platform or comment on posts on the Platform, We collect the content of such communications and comments.
- **Personal Information We Collect Automatically:** As you interact with the Platform, We may collect technical data about your equipment, browsing actions, and patterns, such as how long you spend using different Platform features or whether you have viewed different content distributed on the Platform.
- **Personal Information from Third-Party Integrations:** The Platform integrates with various third-party service providers that the Poppulo Customer may use for various market-based integrations including: Corporate Systems, Education Systems, Hospitality & Entertainment / Casino Gaming Systems, Healthcare Systems, Retail Systems, Manufacturing Systems, Transportation Systems and other industry specific integrations (collectively “Third-Party Integrations”). When the Poppulo Customer enables these Third-Party Integrations, through the Platform We may collect personal information you provide through these Third-Party Integrations.

2. How We Process Your Personal Information

The Poppulo Customer’s primary purpose in collecting personal information is to provide you with a secure, smooth, and efficient experience. Through the Platform, Poppulo processes your personal information on behalf of the Poppulo Customer in the following ways:

- To provide you with communications sent through the Platform by the Poppulo Customer or other Platform users
- To send your communications through the Platform
- To provide you and others with dynamic digital signage

- To provide interactive features within communications sent through the Platform, for example, through embedded surveys or social features including “likes” and comments
- To perform analytics on how you and other users engage with communications sent via the Platform, including whether you interacted with a particular communication and how long you interacted with said communication
- To perform analytics on how you and other users utilize the Platform, including information about most-used Platform features
- To secure the Platform
- To improve the Platform

3. How We Share Your Personal Information

By using the Platform, the Poppulo Customer will share information about you in the following ways:

- **With Other Platform Users:** Certain personal information shared on the Platform is available to other Platform Users. Because the Platform provides communications services, other users may have access to your contact information in order to send you targeted communications. If a communication contains a survey, your survey responses would be shared with the sender. In addition, if you use the Platform’s social features, other users will see if you “like” or comment on a communication.
- **With Third-Party Integrations:** In the same way that the Platform may collect personal information you share through Third-Party Integrations, the Platform may also share information you provide with the Third-Party Integrations that the Poppulo Customer enables.
- **With Poppulo:** We process your personal information on the Platform, so that the Poppulo Customer can offer the Platform services to you. We process information in accordance with this Privacy Policy and are bound by the terms of the service agreement and a data processing agreement with the Poppulo Customer. Pursuant to those agreements, Poppulo can only process your information as the Poppulo Customer directs and in order to improve the Platform.
- **With Platform Subprocessors:** We may share your personal information with our subprocessors that are necessary to provide the Platform services that will only process your information in order to provide the Platform and must do so in accordance with our agreements with them.
- **Compliance with Laws and Law Enforcement Requests; Protection of Our Rights.** The Poppulo Customer may disclose personal information about you to third parties when it has a good faith belief that disclosure is reasonably necessary to: (i) comply with a law, regulation or legal requests including to meet national security or law enforcement requirements; (ii) protect the safety of any person from death or serious bodily injury; (iii) prevent fraud or abuse of the Poppulo Customer or its users, or (d) protect its property rights.
- **Business Transfers.** If Poppulo is involved in a merger, acquisition, or sale of all or a portion of its assets, your information may be transferred as part of that transaction, but Poppulo will notify the Poppulo Customer and/or you (for example, via email and/or a prominent notice on our website) of any change in control or use of personal information.

4. How We Protect and Retain Personal Information

No method of transmission over the internet, or method of electronic storage, is fully secure. While We use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, We cannot guarantee the security of your information. In the event that We are required by law to inform you of a breach to your information, We may notify you electronically, in writing, or by telephone, if permitted to do so by law.

We retain your personal information for only as long as necessary to provide the services, and fulfill the purposes outlined in this Privacy Policy, including for the purposes of satisfying any legal, accounting, or reporting requirements, unless a longer retention period is required or permitted by law. To determine the appropriate
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retention period for your information, We consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, the purposes for which We obtained the information and whether We can achieve those purposes through other means, as well as applicable legal requirements.

5. Your Rights and Choices

Depending on the applicable law in your jurisdiction, you may have some or all of the choices identified below regarding your personal information. Your choices are not absolute. Depending upon the applicable law, access to your rights under the applicable law may be denied: (a) when Poppulo is required by contract to direct all rights requests to the Poppulo Customer who provided you access to the Platform; (b) when denial of access is required or authorized by law; (c) when granting access would have a negative impact on another's privacy; (d) to protect our rights and properties; (e) where the request is frivolous or vexatious, or for other reasons. We will not discriminate against individuals who exercise their privacy rights under applicable law.

- **Access To Your Personal Information.** You may request access to your personal information on the Platform or confirmation that We have information about you on the Platform. In certain limited circumstances, you may also request to receive access to your personal information on the Platform in a portable, machine-readable format.
- **Changes To Your Personal Information.** We rely on you to update and correct your personal information on the Platform. You may ask the Poppulo Customer to correct information on the Platform that is inaccurate or incomplete. Note that We may keep historical information in our backup files as permitted by law.
- **Deletion of Your Personal Information.** You may request that the Poppulo Customer delete your personal information on the Platform. If required by law, the Poppulo Customer will grant a request to delete information on the Platform, but you should note that in many situations the Poppulo Customer must keep your personal information to comply with its legal obligations, resolve disputes, enforce agreements, or for other business purpose.
- **Objection to Certain Processing.** You may object to our use or disclosure of your personal information on the Platform by contacting the Poppulo Customer at the address described below.
- **Automated Individual Decision-Making.** In some jurisdictions, you have the right not to be subject to a decision based solely on automated processing of your personal information, including profiling, which produces legal or similarly significant effects on you, save for the exceptions applicable under relevant data protection laws. We do not use automated processing in a way that produces a legal or similarly significant effects on individuals.
- **Revocation of Consent.** Where We process your personal information using the Platform based upon consent, you may revoke consent. Please note, if you revoke your consent for the processing of personal information using the Platform then We may no longer be able to provide you with the Platform services.

You may exercise the rights described above by contacting the Poppulo Customer who provided you access to the Platform. Note, if you contact Poppulo directly, We may be unable to respond directly to your request due to applicable restrictions within our contract with the Poppulo Customer. Only you or a person you formally authorize to act on your behalf, may make a verifiable consumer request related to your personal information. We may verify your identity by phone call or email. Depending on your request, We may ask for information such as your name, email address, and phone number, or other information verifying your identify. If you use an authorized agent to submit such a request, We will require written proof that the authorized agent has been authorized to act on your behalf or a copy of the power-of-attorney document granting that right.

If you are not satisfied with our response, and are in the EEA, UK or Switzerland, you may have a right to lodge a complaint with your local supervisory authority or data protection authority.

6. Children

We do not knowingly collect personal information from children, and the Platform is not intended for children under the age of 18. Children under the age of 18 should not provide their personal information to us.

7. Tracking Technology

In this section, We explain how We use cookies and similar digital tracking technologies (such as pixels, web beacons, and tags) (collectively “cookies”) on the Platform. We use cookies for a number of purposes as set out below. Cookies can be placed on our Platform by us or by third-party partners We engage for our purposes. In any case, you may by changing your browser settings accordingly. However, as a consequence of your opt-out, certain functions, portions or features of our website may cease working or may prevent you from fully benefiting of our online services.

Categories of Cookies. Some cookies are deleted when you close down your browser. These are known as session cookies. Others remain on your device until they expire or you delete them from your cache. These are known as persistent cookies and these types enable us to remember things about you as a returning visitor. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org. The main categories of cookies We use include:

- **Strictly Necessary.** These cookies are essential to enable you to move around the Platform and use its features and ensuring the security of and access to the Platform. Without these cookies, services you have asked for cannot be provided. These cookies don’t gather information about you for the purposes of marketing.
- **Analytics.** These cookies allow us to count the number of visitors and collect information about how visitors use the Platform, for instance which pages visitors go to most often, and if they get error messages from web pages. All information these cookies collect is used to improve how the Platform works and the user experience. By using our Platform, you agree that We can place these types of cookies on your device, however you can block these cookies using your browser settings (please see "How to manage your cookies" section below). Example: cookies that count page visits, bounce rates, or load times.
- **Functionality.** These cookies allow us to recognize you when you return to the Platform and allows the Platform to remember choices you make. They may also be used to provide services you have requested. The information these cookies collect is de-identified (e.g., it does not contain your name, address, account details, etc.) and they do not track your browsing activity across other websites. By using the Platform, you agree that We can place these types of cookies on your device, however you can block these cookies using your browser settings (please see "How to manage your cookies" section below).

Why We Use Cookies. We use cookies for the following purposes:

- to enable basic functioning of the Platform or to fix any technical issue through gathering relevant technical data;
- for analytics to improve the Platform (structure, features, accessibility and usability, content) or to fix any technical issue through gathering relevant technical data;

How to Manage Your Cookies. The browsers of most computers, smartphones and other web-enabled devices are typically set up to accept cookies. If you wish to amend your cookie preferences for this website or any other websites, you can do this through your browser settings. Your browser’s ‘help’ function will tell you how to do this. If you do not want the benefit of cookies, there is a simple procedure to manually delete your cookies at <https://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html>.

Please remember that cookies are often used to enable and improve certain functions on our website. If you choose to switch certain cookies off, it may affect the user experience.

Analytics. We use Google Analytics, which uses cookies and other similar tracking technologies, to perform website analytics. Learn more about how Google collects and uses data here:

<https://policies.google.com/technologies/partner-sites>. To opt out of Google Analytics entirely please use this link: <https://tools.google.com/dlpage/gaoptout>.

Do Not Track Signals. Some Internet browsers, such as Internet Explorer, Firefox, and Safari, include the ability to transmit “Do Not Track” or “DNT” signals. Because uniform standards for “DNT” signals have not been adopted, the Platform does not currently process or respond to “DNT” signals.

8. Transmission of Information to Other Countries

As part of your use of the Platform, the Poppulo Customer may transmit your personal information from the Platform to a foreign country as is necessary to provide you with the Platform. Such foreign country may have privacy laws that are less stringent than the laws in your country. Nonetheless, where possible the Poppulo Customer takes steps to treat your information from the Platform using the same privacy principles that apply pursuant to the law of the country in which they first received your information through the Platform. If the Poppulo Customer transfers your personal data outside of the EEA, UK or Switzerland, it will ensure that the transfer is lawful and that data processors in third countries are obliged to comply with the applicable laws in those jurisdictions.

9. Additional Information for California Residents

This section only applies to California residents. The chart below identifies the categories of personal information that are collected when you use the Platform, the categories of recipients with whom your personal information is shared and the business purpose for such disclosure. We do not “sell” and/or “share” your personal information (as those terms are defined by California law). For details regarding how your personal information is used, please see the **Personal Information We Collect** section of the Privacy Policy. For information regarding how long your personal information is retained, please refer to the **How We Protect and Retain Personal Information** section of the Privacy Policy.

Category of Personal Information	Disclosures for a Business Purpose
Identifiers – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name, or other similar identifiers. Professional or employment-related information	<ul style="list-style-type: none">• Poppulo and their subprocessors to provide the Platform
Geolocation data	<ul style="list-style-type: none">• Poppulo and their subprocessors to provide the Platform’s location-based features as described in this Privacy Policy
Internet or other electronic network activity information – this may include browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.	<ul style="list-style-type: none">• Poppulo and their subprocessors as is necessary to provide and improve the Platform

The following categories of sensitive personal information (as defined under California law) are collected when you use the Platform: the contents of communications. This information is collected to provide the Platform’s communications features as described in this Privacy Policy and is disclosed to Poppulo and their subprocessors as necessary to provide such Platform features. Note that such information is not used for any purposes that are not identified within California Civil Code Section 1798.121. We neither “sell” nor do we “share” sensitive personal information for purposes of cross-context behavioral advertising.

10. Additional Information for Data Subjects in the European Economic Area, the United Kingdom and Switzerland

Roles. Data protection laws in Europe, the United Kingdom and Switzerland distinguish between organizations that process personal information for their own purposes (known as “controllers”) and organizations that process personal information on behalf of other organizations (known as “processors”). The Poppulo Customer who provided you access to the Platform acts as a controller with respect to personal information collected as you interact with the Platform, and Poppulo acts as a processor at the direction of the Poppulo Customer.

Lawful Basis for Processing. Data protection laws in Europe require a "lawful basis" for processing personal information. The Poppulo Customer’s lawful bases include where: (a) you have given consent to the processing for one or more specific purposes, either to the Poppulo Customer or to its service providers, partners, or business customers; (b) processing is necessary for the performance of a contract with you; (c) processing is necessary for compliance with a legal obligation; or (d) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests.

11. Contact Us

If you have any questions, comments, or complaints concerning our privacy practices with respect to the Platform, please contact the Poppulo Customer who provided you with access to the Platform.

You may also contact Poppulo by emailing privacy@poppulo.com, or by writing to Poppulo, Attn: Privacy, 1221 Broadway, Denver, CO, USA 80203. Note, due to Poppulo’s agreements with the Poppulo Customer, Poppulo may not be able to directly respond to your privacy rights requests.