



# **Sparrow Privacy Policy**

## **Pelican Technologies Sparrow**

Last Modified: April 23, 2019

We at Sparrow (Pelican Technologies, Inc. and our affiliates) are committed to protecting your privacy. This Privacy Policy applies to both our websites (Websites), including [www.sparrowoversight.com](http://www.sparrowoversight.com), [www.technopelican.com](http://www.technopelican.com), and our Subscription Service (the Subscription Service), including our associated mobile applications (Mobile Apps) owned and controlled by Pelican Technologies. This Privacy Policy governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information. By using the Websites or the Subscription Service, you consent to the data practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use the Websites or the Subscription Service.

We periodically update this Privacy Policy. If you subscribe to the Subscription Service, then you will receive notice when this Privacy Policy is modified. The notice will be delivered through the email address that you use when you register as a Viewer or User of Sparrow. We encourage you to review this Privacy Policy periodically.

### **1. Important Information**

#### **1.1. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time by posting a new version online. You should check this page occasionally to review any changes. If we make any material changes we will notify you by posting the revised Privacy Policy on our Websites and, if you subscribe to our Subscription Service, providing notice to the email address that you have used to register as a Viewer or User. This helps you to always be aware of what information we collect, how we use it and under what circumstances, if any, it is disclosed. Your continued use of the Websites, the Subscription Service, and/or continued provision of Personal Information to us will be subject to the terms of the then-current Privacy Policy.

#### **1.2. Contact Us**

If you have any questions about this Privacy Policy or our treatment of the information you provide us, please write to us by email at [privacy@sparrowoversight.com](mailto:privacy@sparrowoversight.com) or by mail to Pelican Technologies, Inc., 1139 West Third Street, Suite 200, Dayton, OH 45402 USA, Attn: Sparrow Privacy.

### **2. Use of the Subscription Service by Sparrow and our Customers**

#### **2.1. The Sparrow Subscription Service**

Our online Subscription Service allows any company that uses it (our customers and Sparrow itself) to build marketing webpages on our servers where visitors can learn more about the company, download content, and provide their contact information and other demographic information. This information, which is stored and managed on our service providers' servers, is then used so that the visitors can be contacted about their interest in the company's goods or services and interact with the company. Sparrow provides the Subscription Service to our customers for their own marketing and operational management functions, and we use it on our Websites for our own marketing and operational management functions.

#### **2.2. Use by Sparrow**

We use our own Subscription Service to build webpages that people can visit to learn more about Sparrow. Information that we collect and manage using the Subscription Service for our own marketing belongs to us and is used, disclosed and protected according to this Privacy Policy.

### 2.3. Use by Our Customers

Our customers use the Subscription Service to build webpages that people can visit to learn more about their business. Sparrow does not control the content of these webpages or the types of information that our customers may choose to collect or manage using the Subscription Service. That information belongs to them and is used, disclosed and protected by them according to their privacy policies and is not subject to this Privacy Policy. Sparrow processes our customers' information as they direct and in accordance with our agreements with our customers, and we store it on our service providers' servers, but we do not have control over its collection or management. Our agreements with our customers prohibit us from using that information, except as necessary to provide and improve the Subscription Service, as permitted by this Privacy Policy, and as required by law. We have no direct relationship with individuals who provide Personal Information to our customers. Sparrow acknowledges that you have the right to access your Personal Information. Our customers control and are responsible for correcting, deleting or updating information they have collected from you using the Subscription Service. If requested to remove data we will respond within a reasonable timeframe. We may work with our customers to help them provide notice to their visitors about their data collection, processing and usage. Our agreements with our customers prohibit them from using the Subscription Service to collect, manage, or process Sensitive Information. We are not responsible for our customers' use of information they collect on the Subscription Service.

Sparrow collects information under the direction of its customers, and has no direct relationship with the individuals whose Personal Information it processes. If you are a customer of one of our customers and would no longer like to be contacted by one of our customer that use our Subscription Service, please contact the customer that you interact with directly. We may transfer Personal Information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our customers.

### 2.4. "Sensitive Information"

This refers to credit or debit card numbers, personal financial account information, Social Security numbers, passport numbers, driver's license numbers or similar personal identifiers, racial or ethnic origin, physical or mental health condition or information, or other employment, financial or health information.

## 3. Information We Collect

### 3.1. When You Visit our Websites

You are free to explore the Websites without providing any information about yourself. When you visit the Websites or register for the Subscription Service, we request that you provide Personal Information about yourself, and we collect Navigational Information.

### 3.2. When You Use our Mobile Application

We use mobile analytics software to allow us to better understand the functionality of our Mobile Apps on your mobile device. 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. In addition to information we collect on our Websites, when you use our Mobile Apps we may also collect your GPS location, city location, device model and version, device identifier (or "UDID"), OS version, and your Sparrow Subscription Service credentials.

We send push notifications from time to time in order to update you about events or promotions. If you no longer wish to receive such communications, you may turn them off at the device level.

We may link information we store within the analytics software to Personal Information you submit within the Mobile App. We do this to improve services we offer you and improve our marketing, analytics and site functionality.

### 3.3. "Personal Information"

This refers to any information that you voluntarily submit to us and that identifies you personally, including contact information, such as your name, e-mail address, company name, address, phone number, and other information about yourself or your business. Personal Information can also include information about any transactions, both free and paid, that you enter into on the Websites, and information about you that is available on the internet, such as from Facebook, LinkedIn, Twitter and Google, or publicly available information that we acquire from service providers.

### 3.4. "Navigational Information"

This refers to information about your computer and your visits to this website such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed. Please see the "Navigation Information" section below.

### 3.5. Payment Information

We collect and process payment information from you when you subscribe to the Subscription Service, including credit cards numbers and billing information, using third party PCI-compliant service providers. Except for this, we do not collect Sensitive Information from you.

### 3.6. Information About Children

The Websites are not intended for or targeted at children under 13, and we do not knowingly or intentionally collect information about children under 13. If you believe that we have collected information about a child under 13, please contact us at [privacy@sparrowoversight.com](mailto:privacy@sparrowoversight.com), so that we may delete the information.

## 4. How We Use Information We Collect

### 4.1. Compliance with Our Privacy Policy

We use the information we collect only in compliance with this Privacy Policy. Customers who subscribe to our Subscription Services are obligated through our agreements with them to comply with this Privacy Policy.

### 4.2. We Never Sell Personal Information

We will never sell your Personal Information to any third party.

### 4.3. Use of Personal Information

In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information to: (a) improve your browsing experience by personalizing the Websites and to improve the Subscription Service; (b) send information to you which we think may be of interest to you by post, email, or other means; (c) send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, and (d) provide other companies with statistical information about our users -- but this information will not be used to identify any individual user. We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do not transfer your unique Personal Information to the third party. In addition, we may share data with trusted partners to contact you based on your request to receive

such communications, help us perform statistical analysis, or provide customer support. Such third parties are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information.

#### 4.4. Use of Navigational Information

We use Navigational Information to operate and improve the Websites and the Subscription Service. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalized information about Sparrow.

#### 4.5. Customer Testimonials and Comments

We post customer testimonials and comments on our Websites, which may contain Personal Information. We obtain each customer's consent via email prior to posting the customer's name and testimonial.

#### 4.6. Use of Credit Card Information

If you give us credit card information, we use it solely to check your financial qualifications and collect payment from you. We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use information you provide except for the sole purpose of credit card processing on our behalf.

#### 4.7. Service Providers

We employ other companies and people to provide services to visitors to our Websites, our customers, and users of the Subscription Service and may need to share your information with them to provide information, products or services to you. Examples may include removing repetitive information from prospect lists, analyzing data, providing marketing assistance, processing credit card payments, supplementing the information you provide us in order to provide you with better service, and providing customer service. In all cases where we share your information with such agents, we explicitly require the agent to acknowledge and adhere to our privacy and customer data handling policies.

#### 4.8. Security of your Personal Information

We use a variety of security technologies and procedures to help protect your Personal Information from unauthorized access, use or disclosure. We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When sensitive Personal Information (such as a credit card number and/or geo-location data) is collected on our Websites and/or transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

If you have any questions about the security of your Personal Information, you can contact us at [privacy@sparrowoversight.com](mailto:privacy@sparrowoversight.com).

#### 4.9. Social Media Features

Our Websites may include Social Media Features, such as the Facebook Like button and Widgets, such as the Share This button or interactive mini-programs that run on our sites. These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Websites. This Privacy Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

#### 4.10. External Websites

Our Websites provide links to other websites. We do not control, and are not responsible for, the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

#### 4.11. Private Forums

We offer publicly accessible areas where messages can be posted to our customers. Please keep in mind that if you directly disclose any information through our message boards, this information may be collected and used by others. We will correct or delete any information you have posted on the Websites if you so request, as described in "Opting Out and Unsubscribing" below.

#### 4.12. Retention of Personal Information

We retain Personal Information that you provide us as long as we consider it potentially useful in contacting you about the Subscription Service or our other services, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements, and then we securely delete the information. We will delete this information from the servers at an earlier date if you so request, as described in "Opting Out and Unsubscribing" below. If you provide information to our customers as part of their use of the Subscription Service, our customers decide how long to retain the personal information they collect from you. If a customer terminates its use of the Subscription Service, then we will provide customer with access to all information stored for the customer by the Subscription Service, including any Personal Information provided by you, for export by the customer according to our agreement with our customer. After termination, we may, unless legally prohibited, delete all customer information, including your Personal Information, from the Subscription Service.

#### 4.13. International Transfer of Information

To facilitate our global operations, we may transfer and access Personal Information from around the world, including the United States. This Privacy Policy shall apply even if we transfer Personal Information to other countries.

#### 4.14. Corporate Events

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by Sparrow on the Websites and the Subscription Service. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information.

#### 4.15. Compelled Disclosure

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

### 5. Navigational Information

#### 5.1. Cookies

Sparrow and its partners use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole.

We use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web server. Cookies are not used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a Web server in the domain that issued the cookie to you. One of the primary

purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize pages on our Websites, or register for the Subscription Service, a cookie helps us to recall your specific information on subsequent visits. When you return to the same Website, the information you previously provided can be retrieved, so you can easily use the customized features.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Sparrow Subscription Service or Websites you visit. Sparrow keeps track of the Websites and pages you visit within Sparrow, in order to determine what portion of the Sparrow Website or Subscription Service is the most popular or most used. This data is used to deliver customized content and promotions within the Sparrow Website and Subscription Service to customers whose behavior indicates that they are interested in a particular subject area.

## 5.2. Log Files

We may collect demographic information, such as your ZIP code, age, gender, preferences, interests and favorites using log files that are not associated with your name or other personal information. There is also information about your computer hardware and software that is automatically collected by us. This information can include: your IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses. This information is used by Sparrow for the operation of the Subscription Service, to maintain quality of the Subscription Service, and to provide general statistics regarding use of the Sparrow Website. For these purposes, we do link this automatically-collected data to Personal Information such as name, email address, address, and phone number.

## 5.3. Clear Gifs (Web Beacons/Web Bugs)

We employ a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), that help us better manage the Website and Subscription Service by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages or in emails and are about the size of the period at the end of this sentence. We use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. We tie the information gathered by clear gifs in emails to our customers' Personal Information. If you would like to opt-out of these emails, please see "Opting Out and Unsubscribing".

## 5.4. Navigational Information Collected by Our Customers

Our customers can use the tools we provide, as well as tools provided by third parties, to collect Navigational Information when you visit their webpages on the Subscription Service. Sparrow does not control our customers' use of these tools, nor do we control the information they collect or how they use it.

## 5.5. Flash Cookies and Other Third Party Tracking Technologies

The Adobe Flash Player (and similar applications) use technology to remember settings, preferences and usage similar to browser cookies but these are managed through a different interface than the one provided by your Web browser. This technology creates locally stored objects that are often referred to as "Flash cookies." Sparrow does not use Flash cookies. However, our customers of our software platform may create pages on the Sparrow platform that employ Adobe Flash cookies. Sparrow does not have access or control over our customers' Flash cookies, but you may access your Flash management tools from Adobe's web site directly.

Similarly, our customers may create pages using the Sparrow Subscription Service that use technology from tracking utility companies, such as cookies and web beacons. The use of these technologies by our customers is not covered by our Privacy Policy. We do not have access or control over these third party tracking technologies.

## 5.6. Advertising

We partner with a third party ad network to either display advertising on our Web site or to manage our advertising on other sites. Our ad network partner uses cookies and Web beacons to collect non-personal information about your activities on this and other Web sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by clicking here:

<http://preferences.truste.com/> (or if located in the European Union, by clicking here:

<http://www.youronlinechoices.eu/>). Please note this does not opt you out of being served advertising. You will continue to receive generic ads.

## 5.7. Third Party Tracking Technologies

The use of cookies and web beacons by any tracking utility company is not covered by our Privacy Policy. We do not have access or control over these third party tracking technologies.

## 6. Opting Out and Unsubscribing

### 6.1. Reviewing, Correcting and Removing Your Personal Information

Upon request Sparrow will provide you with information about whether we hold any of your Personal Information. If you provide us with your Personal Information, you have the following rights with respect to that information:

- To review the user information that you have supplied to us
- To request that we correct any errors, outdated information, or omissions in user information that you have supplied to us
- To request that your user information not be used to contact you
- To request that your user information be removed from any solicitation list that we use
- To request that your user information be deleted from our records
- To opt out of being solicited by Sparrow or third parties

To exercise any of these rights, please contact us at [privacy@sparrowoversight.com](mailto:privacy@sparrowoversight.com) or by mail to Pelican Technologies, Inc., 1139 West Third Street, Suite 200, Dayton, OH 45402 USA, Attention: Sparrow Privacy. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

### 6.2. To Unsubscribe From Our Communications

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, or by sending us email at [privacy@sparrowoversight.com](mailto:privacy@sparrowoversight.com), or by sending us postal mail to Pelican Technologies, Inc., 1139 West Third Street, Suite 200, Dayton, OH 45402 USA, Attention: Sparrow Privacy. Customers cannot opt out of receiving transactional emails related to their account with us or the Subscription Service.

### 6.3. To Unsubscribe from Our Customers' Communications

Our customers are solely responsible for their own marketing emails and other communications; we cannot unsubscribe you from their communications. You can unsubscribe from our customers' marketing communications by clicking on the "unsubscribe" link located on the bottom of their emails, or by contacting them directly.