

## Privacy Policy

We at Growth Drive Holdings, LLC dba Growth-Drive (aka Growth Drive) and our affiliates are committed to protecting your privacy. This Privacy Policy applies to the information and data collected by Growth Drive when you interact with our websites, product and services, and any other sites or services that link to this Privacy Policy. This includes when you:

- interact with us on our websites or through other channels (for example, by communicating with us or attending one of our events);
- use our product and services (including the Growth Drive Subscription Service); and
- when you use any other sites or services that link to this Privacy Policy.

This Privacy Policy describes how we collect, receive, use, store, share, transfer, and process your Personal Data. It also describes your choices and rights with respect to your Personal Data, including your rights of access and correction of your Personal Data. For the purposes of this Privacy Policy "Personal Data" means any information relating to an identified or identifiable individual. If you do not agree with this Privacy Policy, you should not use our websites, product and services, or any other sites or services that link to this Privacy Policy.

Growth Drive customers may collect and manage Personal Data when using our product and services, or what we may refer to as the Subscription Service. "Subscription Service" is defined in the Growth Drive Customer Terms of Service and means all of our web-based applications, tools and platforms that you have subscribed to under an Order Form or that we otherwise make available to you, and are developed, operated, and maintained by us, accessible via <https://growth-drive.com>, <https://growth-capacity.com> or another designated URL, and any ancillary products and services, including website hosting, that we provide to you. When you use the Subscription Service, Growth Drive processes Personal Data as a processor under the direction of our customers. Our customers, as data controllers, are responsible for complying with any regulations or laws that require providing notice, disclosure, and/or obtaining consent prior to collecting their customers' Personal Data using the Subscription Service. Please see Section 1.b "Information We Process on Behalf of our Customers When They Use the Subscription Service" and Section 1.c "Information We Collect and Process When You Use the Subscription Service" as well as our Customer Data Processing Agreement for more information.

We update this Privacy Policy from time to time and we encourage you to review this Privacy Policy periodically. We will post any Privacy Policy changes on this page and, if the changes are material, we will provide a more prominent notice by sending you an email notification. Terms not otherwise defined in this Privacy Policy will have the meaning as set forth in the Growth Drive Customer Terms of Service.

If you have any questions about this Privacy Policy or our treatment of your Personal Data, or to exercise your rights to delete or modify your Personal Data, please contact [support@growth-drive.com](mailto:support@growth-drive.com)

### 1. What Information We Collect About You

#### a. Information You Provide to Growth Drive

When you interact with us via our websites or any sites or services that link to this Privacy Policy (including the [growth-capacity.com](https://growth-capacity.com) web application) or use the Subscription Service, we may collect Personal Data and other information from you, as further described below.

#### When You Visit Our Websites

We collect Personal Data from you when you submit web forms or interact with our websites, for example by subscribing to a Growth Drive blog, signing up for a webinar, subscribing to one of our services or requesting customer support. We may ask for your email address, first and last name, job title, and other similar business information. You are free to explore some of our websites without providing any Personal Data about yourself.

When you register for a Growth Drive event, we collect information such as name, address, phone number, and email address. We use this information to communicate with you and in some cases facilitate your registration. Additionally, we may share your registration data with service providers in order to provide event information and improve your experience at current or future Growth Drive events.

## Account and User Information

We collect Personal Data when you sign-up for a Growth Drive account, create or modify user information, set preferences, or provide any other related information to access or utilize our Subscription Service.

## Payment Information

We collect payment and billing information when you register for paid products or services. For example, we may ask you to provide a billing address, or a billing contact for your Growth Drive account. If you give us payment information, we use it solely as authorized by you in accordance with this Privacy Policy.

You may also provide payment information, such as a credit card number or bank account numbers, when purchasing products or services. We use secure third-party payment service providers to manage payment processing, which is collected through a secure payment process.

## Customer Testimonials

We post customer testimonials and comments on our websites, which may contain Personal Data. We obtain each customer's consent via email or through other agreements between customers and Growth Drive prior to posting the customer's name and testimonial.

### b. Information We Process on Behalf of Customers When they Use the Subscription Service

Our product, or the Subscription Service, allows our customers to access our community, products and services. When customers use our products, they may collect Personal Data such as first and last name, email address, physical address, phone number, or other information about you. We call the information that our customers submit or collect via the product 'Customer Data' under our Customer Terms of Service.

We do not control the content of our customers' webpages or the types of Personal Data that our customers may choose to collect or manage using the Subscription Service. We store our customers' information on our service providers' servers but process it as a processor under our customers' instructions and in accordance with our Customer Terms of Service, which prohibit us from using the information except as necessary to provide and improve the Subscription Service and as required by law.

Our customers control and are responsible for correcting, deleting or updating the information they process using the Subscription Service and for complying with any regulations or laws that require providing notice, disclosure, and/or obtaining consent prior to transferring the Personal Data to Growth Drive for processing purposes.

### c. Information We Collect and Process When You Use the Subscription Service

#### Usage Data

We collect usage data when you or your users in your Growth Drive account interact with the Subscription Service. Usage data includes metrics and information regarding your use and interaction with the Subscription Service such as what product features you use the most.

We may engage third party providers to collect usage data. For more information about how we protect your information with these service providers, please see Section 3 "How We Share Information We Collect".

#### Mobile

When you access or use the Subscription Service via our mobile applications, we automatically collect information such as your device model and version, operating system, or device identifier.

#### Third Party Integrations

You may connect third party integrations to your Growth Drive account, which may ask for certain permissions to access data or send information to your Growth Drive account. It is your responsibility to review any third party integrations you authorize. We may collect information about what types of integrations you use in your Growth Drive account.

Any permission(s) granted by you, grants these third parties access to your data, which may include (but is not limited to) granting third party applications access to view, store, and modify your Growth Drive account data. We are not responsible for the practices of third party integrations, so please carefully review the permissions you grant to third party applications.

#### Log Files

Like most websites and technology services delivered over the Internet, we automatically collect and store information about your computer hardware and software when you visit our websites, use our product and services, or visit other sites or services that link to this Privacy Policy. This information can include your IP address, browser type, domain names, internet service provider (ISP), and the files viewed on our websites (e.g., HTML pages, graphics, etc.), the files viewed on our, or our customer's websites (if those websites are hosted on Growth Drive e.g. HTML pages or, graphics etc), your operating system, access times and referring website addresses.

When you use the Subscription Service, we collect and store the categories of information listed above in logs in the following instances, subject to the customer's implementation settings:

- - When a Growth Drive user logs into their account and accesses tools in the Growth Drive Platform; or
- - When an individual visits a customer's website, if the customer's website is self-hosted, if the customer uses our plug-ins or url links

#### Social Media Features

Our websites may include social media features (such as the Facebook 'like' button) and widgets (such as the share button or interactive mini-programs) that run on our websites. 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.

#### Other Growth Drive Companies

We may receive information about you from other companies that are owned or operated by Growth Drive.

## 2. How We Use Your Information

### a. To Communicate with You About the Product and Services

We use the account information you provide to Growth Drive when signing up for the Subscription Service to send you transactional emails or in-app notification about billing, account management, and other administrative matters. We may also send you updates regarding our Customer Terms of Service or other legal agreements, and may also communicate with you about security incidents via email or in-app notification.

We use your information to provide customer support, such as resolving technical issues you encounter and analyzing product outages or bugs.

If you use the Growth Drive mobile applications, we may send you push notifications from time to time in order to update you about events and promotions. If you no longer wish to receive such communications, you may turn them off at the device level.

### b. To Provide the Subscription Service

We use your account information and Customer Data to provide the product and services to you. For example, we use the email address you provide when signing up for the product to create your user account, and we use your payment information to process payments for paid use of the Subscription Service. We also use this information to authenticate you when you log in and to provide customer support.

#### c. To Improve and Develop Our Product and Services

We collect usage data about how you or your users interact with our product and services. We use this data to develop and improve our products and services. For example, we use usage data to assess trends and usage across the product to help us determine what new features or integrations our users may be interested in.

We use Customer Data in an anonymized manner for machine learning that supports certain product features and functionality with the Subscription Service. For example, machine learning helps power the business card scanner tool if you use our mobile apps and allows for easier imports of data into your Growth Drive account. You may opt-out of having your Customer Data used for machine learning purposes by emailing [privacy@Growth-Drive.com](mailto:privacy@Growth-Drive.com)

We may publish data about how our product and services are being used across our customer base. When we share statistical information externally in this way, the data will be aggregated and we will not identify individual users or customers. For example, we may publish blog posts on trends or insights into how users are interacting with our product.

#### d. To Secure and Protect our Product and Growth Drive Users

We use your account information to investigate and help prevent security incidents. We may also use this information to meet legal requirements. We use your information to verify user accounts, new product sign-ups, and to detect and prevent product abuse.

We use log files to provide general statistics regarding use of the websites by you, including how you use our websites, what country you are logging in from (for analytics, export control and regulatory purposes) and to help improve the navigation experience. Your IP address is also collected and logged for security and debugging purposes, for example to track access patterns, investigate security events and incidents. For these purposes we do link this automatically-collected data to other personal data provided by you such as name, email address, address, and phone number.

#### e. To Market and Promote the Subscription Service

We use the information you provide to Growth Drive to market and promote the products, services, and other offerings. For example, we use the information, like your email or physical address, to send information or Growth Drive content to you which we think may be of interest to you by post, email, or other means and send you marketing communications relating to our business. We use this information to promote the use of our services to you and share promotional and information content with you in accordance with your communication preferences.

We may also reach out to you via telephone to ask about other Growth Drive products or services you may be interested in. If you have a call scheduled with a Growth Drive representative, we may record and transcribe the call. You will be notified prior to the call that the call is being recorded, and you will be offered an opportunity to opt-out of having the call recorded.

We receive information from third party service providers and other sources such as third party providers of business information and publicly available sources. We may receive and use this information from these service providers and other sources in combination with other information we collect through other means described in this Privacy Policy for the purposes of providing you with updates and an improved Subscription Service, like personalized communications, event promotion, and tailoring the websites or product to improve user experience.

#### f. Other purposes if we obtain your consent

We share your data with third parties when you give us consent to do so.

#### g. Legal Basis for Processing Personal Data (EEA and UK visitors only)

Our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it. However, we will normally collect Personal Data from you only where we have your consent to do so, where we need the Personal Data to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Data from you.

If we ask you to provide Personal Data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Data is mandatory or not (as well as of the possible consequences if you do not provide your Personal Data). Similarly, if we collect and use your Personal Data in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

### 3. How We Share Information We Collect

#### a. Third Party Service Providers

We use third party service providers to support our websites, products, and services. For example, we use service providers for data hosting, application development, and marketing. We may need to share your information with service providers to provide information about products or services to you. Examples may include removing repetitive information from prospect lists, analyzing data or performing statistical analysis on your use of the Subscription Service or interactions on our websites, providing marketing assistance, processing credit card payments, supplementing the information you provide us in order to provide you with better service, developing and improving the product and services, and providing customer service or support. These service providers are prohibited from using your Personal Data except for these purposes, and they are required to maintain the confidentiality of your information. In all cases where we share your information in this way, we explicitly require the third party service providers to acknowledge and adhere to our privacy and data protection policies and standards.

#### b. Partners

We may share data with trusted Growth Drive partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide sales support, or provide customer support. Partners are prohibited from using your Personal Data except for these purposes, and they are required to maintain the confidentiality of your data.

#### c. 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 Growth Drive 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 Data, and choices you may have regarding your Personal Data.

#### d. Public Forums

Our websites may offer publicly accessible message boards, blogs, and community forums (e.g. Growth Drive Community). Please keep in mind that if you directly disclose any information through our public message boards, blogs, or forums (including profile information associated with the account you use to post the information) it may be read, collected and used by any member of the public who accesses these websites. Your posts and certain profile information may remain even after you terminate your account. We urge you to consider the sensitivity of any information you may disclose in this way. We will correct or delete any information you have posted on the websites if you so request, as described in Section 7 "How to Access & Control Your Personal Data" below. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

#### e. Compelled Disclosure

We reserve the right to use or disclose your Personal Data 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. If you use the Subscription Service, Customer Data is considered Confidential Information and you should review the Confidentiality terms in the Customer Terms of Service for more information.

#### c. Privacy Shield Notice

Growth Drive participates in and complies with the EU-U.S. Privacy Shield Framework and the Swiss–U.S. Privacy Shield Framework (collectively, "Privacy Shield Frameworks") regarding the collection, use, and retention of Personal Data of individuals in the European Union, Switzerland and UK. The following affiliated entities adhere to the Privacy Shield

Principles: Growth Drive Ireland Limited, Growth Drive Germany GmbH, Growth Drive France S.A.S, Growth Drive UK Holdings Limited, Growth Drive Canada Inc., Growth Drive Australia Pty Ltd, Growth Drive Asia Pte. Ltd., Growth Drive Latin America S.A.S, and Growth Drive Japan KK. Growth Drive is committed to subjecting all Personal Data received from European Union (EU) member countries, Switzerland and the UK in accordance with the Privacy Shield Principles. Please note that we do not rely on the EU-U.S. Privacy Shield as a data transfer mechanism.

## 5. How We Store and Secure Your Information

### a. Data Storage and Security

We use a variety of security technologies and procedures to help protect your Personal Data from unauthorized access, use or disclosure. We secure the Personal Data you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All Personal Data is protected using appropriate physical, technical and organizational measures.

### b. Retention of Personal Data

How long we keep information we collect about you depends on the type of information and how we collect and store it. After a reasonable period of time, we will either delete or anonymize your information or, if this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

We retain Personal Data that you provide to us where we have an ongoing legitimate business need to do so (for example, as needed to comply with our legal obligations, resolve disputes and enforce our agreements).

When we have no ongoing legitimate business need to process your Personal Data, we securely delete the information or anonymize it or, if this is not possible, securely store your Personal Data and isolate it from any further processing until deletion is possible. We will delete this information at an earlier date if you so request, as described in the section "How to Access & Control Your Personal Data" below.

If you have elected to receive marketing communications from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, products, or services, such as when you last opened an email from us or ceased using your Growth Drive account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

The data our customers process in connection with the Subscription Service is retained according to Growth Drive Customer Terms of Service.

## 6. Cookies and Similar Technologies

### a. Cookies

When you visit our websites, sign up for a Growth Drive account, attend a Growth Drive virtual event, or request more information about Growth Drive, we collect information automatically using tracking technologies, like cookies and tracking pixels. For more information please refer to our Cookie Policies below.

Growth Drive and our partners use cookies or similar technologies (such as web beacons and JavaScript) to analyze trends, administer the website, monitor how visitors navigate around the websites, and to gather demographic information about our user base as a whole.

### b. Third Party Tracking Technologies

The use of cookies and web beacons by any tracking utility company is not covered by our Privacy Policy or Cookie Policy.

## 7. How to Access & Control Your Personal Data

### a. Reviewing, Correcting and Removing Your Personal Data

You have the following data protection rights:

- - You can request access, correction, updates or deletion of your Personal Data.

- - You can object to our processing of your Personal Data, ask us to restrict processing of your Personal Data or request portability of your Personal Data.
- - If we have collected and processed your Personal Data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your Personal Data.

To exercise any of these rights please email [privacy@growth-drive.com](mailto:privacy@growth-drive.com)

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We will respond to your request to change, correct, or delete your data within a reasonable timeframe and notify you of the action we have taken.

If you are a customer, prospect, or otherwise interact with a Growth Drive customer that uses our Subscription Service and would like to access, correct, amend or delete your data controlled by the customer, please contact the relevant customer directly. Growth Drive acts as a processor for our customers and will work with our customers to fulfill these requests when applicable.

#### b. Anti-Spam Policy

Our acceptable use policy applies to us and to our customers and, among other things, prohibits use of the Subscription Service to send unsolicited commercial email in violation of applicable laws, and requires the inclusion in every email sent using the Subscription Service of an "opt-out" mechanism and other required information. We require all of our customers to agree to adhere to the Acceptable Use Policy at all times, and any violations of the Acceptable Use Policy by a customer can result in immediate suspension or termination of the Subscription Service.

#### c. To Unsubscribe From Our Communications

You may unsubscribe from our marketing communications through one of the following methods:

- - by clicking on the "unsubscribe" link located on the bottom of our e-mails;
- - updating your communication preferences

Customers cannot opt out of receiving transactional emails related to their account with us or the Subscription Service.

#### d. 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. If you are a customer, prospect, or otherwise interact with a Growth Drive customer, 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.

### 8. California Privacy Rights

#### a. Applicability

This section applies only to California consumers. For purposes of this section "Personal Information" has the meaning given in the California Consumer Privacy Act ("CCPA"). It describes how we collect, use, and share California consumers' Personal Information in our role as a business, and the rights applicable to such residents. The California Consumer Privacy Act ("CCPA") requires businesses to disclose whether they sell Personal Information. Growth Drive is a business, and does not sell Personal Information. We may share Personal Information with third parties if those third parties are authorized service providers or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such Personal Information.

If you are unable to access this Privacy Policy due to a disability or any physical or mental impairment, please contact us and we will arrange to supply you with the information you need in an alternative format that you can access.

#### b. How We Collect, Use, and Share your Personal Information

We have collected the following statutory categories of Personal Information in the past twelve (12) months:

- - Identifiers, such as name, e-mail address, mailing address, and phone number. We collect this information directly from you or from third party sources.
- - Commercial information, such as subscription records. We collect this information directly from you.
- - Internet or network information, such as browsing and search history. We collect this information directly from your device.
- - Geolocation data, such as IP address. We collect this information from your device.
- - Financial information, such as Payment Information or financial account numbers in the process of providing you with a subscription. We collect this information from you.
- - Inferences.
- - Other Personal Information, in instances when you interact with us online, by phone or mail in the context of receiving help through our help desks or other support channels; participation in customer surveys or contests; or in providing the Subscription Service.

The business and commercial purposes for which we collect this information are described in Section 2 of this Privacy Policy. The categories of third parties to whom we "disclose" this information for a business purpose are described in Section 3 of this Privacy Policy.

#### c. Your California Rights

You have certain rights regarding the Personal Information we collect or maintain about you. Please note these rights are not absolute, and there may be cases when we decline your request as permitted by law. The right of access means that you have the right to request that we disclose what Personal Information we have collected, used and disclosed about you in the past 12 months. The right of deletion means that you have the right to request that we delete Personal Information collected or maintained by us, subject to certain exceptions. The right to non-discrimination means that you will not receive any discriminatory treatment when you exercise one of your privacy rights.

Growth Drive does not sell Personal Information to third parties (pursuant to California Civil Code §§ 1798.100–1798.199, also known as the California Consumer Privacy Act of 2018).

#### d. How to Exercise your California Rights

You can exercise your rights yourself or you can alternatively designate an authorized agent to exercise these rights on your behalf. Please note that to protect your Personal Information, we will verify your identity by a method appropriate to the type of request you are making. We may also request that your authorized agent have written permission from you to make requests on your behalf, and we may also need to verify your authorized agent's identity to protect your Personal Information.

Please use the contact details below, if you would like to:

- Access this policy in an alternative format;
- Exercise your rights;
- Learn more about your rights or our privacy practices; or
- Designate an authorized agent to make a request on your behalf.

#### 9. Data Protection

If you have any questions about this Privacy Policy or our privacy practices, or if you have a disability and need to access this notice in a different format, please email [support@growth-drive.com](mailto:support@growth-drive.com).

#### 10. Other Important Privacy Information

##### a. We Never Sell Personal Data

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

##### b. Information About Children

The websites, product and services are not intended for or targeted at children under 16, and we do not knowingly or intentionally collect Personal Data about children under 16. If you believe that we have collected Personal Data about a child under 16, please contact us [here](#), so that we may delete the information.

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