

Privacy Policy

INTRODUCTION

Last Revised: October 1, 2020

Your privacy is important to Fourth Enterprises, LLC, Fourth Ltd., Fourth USA Inc., and their affiliates (collectively, “Fourth”, “we” or “us”). This privacy policy (“Policy”) details how Fourth collects, uses, stores, shares, and processes personal information when you use Fourth products or services, including its websites, mobile applications, social media pages, support, and other offerings that link to this Policy (collectively “Services”). This Policy also explains the rights and choices you have in relation to your personal information.

This Policy applies when you directly access the Services or share information with Fourth, as indicated below. By using the Services, you consent to this Policy. If you do not consent to this Policy for any reason, please do not use the Services or share your information with us. Please note that this Policy applies only to information that you directly provide to Fourth while accessing or using the Services on your own behalf. Any data that you input to one of our subscription services within the scope of your employment or on behalf of your employer or any other organization, is not subject to this Policy. Data provided to our subscription services pursuant to your employment is subject to the privacy policies of your employer (as the data controller or business); however, Fourth (as the data processor or service provider) is bound by its data processing commitments with such employer. Any such employee should direct their privacy questions or concerns directly to their employer.

We do not control the privacy policies or practices of others. This Policy does not apply to any other third-party website or service linked to or from it (except with regard to Fourth subprocessors, as set forth below), or any third-party website or service in which Fourth content or functionality is embedded, including without limitation, those of your employer. We may occasionally update this Policy. When we do, we will revise the “Last Revised” date at the top of the Policy. Your continued use of the Services on or after such date constitutes your acceptance of the then-effective Policy. The most current version of this Policy is posted publicly at <https://www.fourth.com/privacy-policy/>.

Fourth encourages you to read this Policy in its entirety, but here are links to the key sections:

[OUR COLLECTION OF INFORMATION](#)

[OUR USE OF INFORMATION](#)

[DISCLOSURE OF YOUR PERSONAL INFORMATION](#)

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OUR COLLECTION OF INFORMATION

In general, we receive and collect information about you via the Services, including through website input fields (including advertisements), phone, email (including email campaigns), web chat, registration for or attendance at events or webinars, your access or downloading of certain content, and participation in other interactions with us. You have the choice on what information to share and the services you want to engage, but in general some information about you is required in order for you to access certain functionality of the Services, such as those mentioned above or for tracking your preferences, subscribing to a newsletter, or initiating other such actions.

Information that we collect from the Services. Through your interaction with the Services, we may collect personal information that can identify or relates to you, including but not limited to your first and last name, telephone number, IP, postal, and email addresses. Personal information we collect through the Services may also include:

- your e-mail marketing preferences;
- financial information, if requested;
- information about your country of residence;
- information used to customize and facilitate your use of our Services, including login and technical information;
- inquiries about and orders for our products and services;
- information that assists us in identifying the products and services that best meet your requirements;

- photographs and data from your camera via a mobile application to allow you to upload photographs to mobile services;
- your calendar and related information to allow for synchronization with the Services;
- event registration information, including your name, email address, company, and in some instances, emergency contact, and dietary requirements;
- resumes, CVs, employment history, and related information;
- feedback about our Services, and other information provided when you report an issue with our Services;
- records and copies of your correspondence (including e-mail addresses), if you contact us;
- your responses to surveys that we might ask you to complete for research purposes;
- details of transactions you carry out through our Services; and
- your search queries on our or through our Services.

Information that we collect automatically. We may use cookies, log files, web beacons, device identifiers, advertising identifiers, and similar tracking technologies, including those from third-party service providers like Google Analytics and other cloud-based tools, to automatically collect your preferences, performance data, and information about your usage when you access or use the Services. For example, we may collect your IP address, device and Internet service provider information, Web browser details, and the address of any referring website to track the number of visitors to the Services, to determine and analyze visitors' use of our Services (including the effectiveness of online advertising), to store information that you provide such as your preferences, and to store technical information useful for your interactions with our Services. We may use session cookies (cookies that are deleted when your browser session ends) to store your user ID, elements of your user profile, to facilitate your movement around our Services (particularly in connection with information searches and order placement), and other information useful in administering the session. We may also collect geolocation signals from your IP address, as well as application and device settings, to determine your location so that we may operate and personalize the Services for you, including to provide more relevant ads and search results. Additionally, we may collect information about your online activity, such as pages viewed and interactions with other users. The Services are not designed to recognize or respond to "do not track" signals received from browsers. You can control the information collected by such tracking technologies or be alerted when cookies are sent by adjusting the settings on your Internet browser or devices, but such adjustments may affect or disable certain functionality of the Services. For more information about how we utilize cookies and your related choices see our Cookie Declaration at <https://www.fourth.com/legal/cookie-declaration/>. You can learn more about Google Analytics and your options for opting out of interest-based Google ads at <https://adssettings.google.com>. You can learn more about

targeted ads and your ability to opt out of receiving interest-based ads at <https://www.youronlinechoices.com/> and www.networkadvertising.org/choices.

Information We Collect from Other Sources. If you, your employer, or your employees or other personnel or representatives have an existing relationship with us, we may already have information about you and such other parties. We may also collect information about you from other third parties, such as third-party verification services, credit bureaus, mailing list providers, and publicly available sources.

OUR USE OF INFORMATION

We process your personal information with your consent or as needed to provide you Services. We may also use your personal information to comply with legal obligations, operate our business, protect the vital interests of you, our customers, or the public, or for other legitimate interests of Fourth as described in this Policy. More specifically, we may use your personal information for:

Facilitation and Improvement of the Services. We use your information to deliver Services or carry out transactions you have requested. We use the information we collect to understand how our Services are being used and to make improvements. For example, we may use process, device, and usage information to provide our users with more relevant content and improve our Service offerings. In addition, we may use this information to analyze trends, assess and improve the overall experience of users of our Services, to improve the security of our Services, and to diagnose potential technical problems. Your information also may be used to personalize your experience on our Services. To offer you a more consistent experience in your interactions with us, information collected by or through our Services may be combined with information we collect by other means. Fourth or our third-party service providers use website tracking technologies to display products or features that are tailored to your interests and to present advertising on other sites. For more information on managing your choices in relation to cookies, see the section “*Information that we Collect Automatically*” (above) regarding the use of cookies and other tracking technologies.

Communications. We may use your information to inform you or other users of products or services available from us. For example, if you provide information to us in a “Contact Us” form, we will use your information to respond to the request and communicate with you. We also use it to send administrative information, such as notices related to products, services, or policy changes. We may use the contact information we collect from you and information about your activity on our Services to provide you with information that we believe may be of interest to you, such as product announcements, newsletters, educational materials,

details on upcoming events, personalized advertisements and content, and other marketing communications. Moreover, each e-mail communication we send includes an unsubscribe link allowing you to stop delivery of that type of communication.

IF YOU EXPRESSLY CONSENT TO RECEIVE SMS (TEXT) MESSAGES, WE MAY SEND YOU INFORMATION RELATING TO OUR SERVICES AND MARKETING COMMUNICATIONS (ADVERTISEMENTS) FOR OUR SERVICES VIA SMS. IF YOU WISH TO OPT OUT OF SUCH MARKETING MESSAGES, REPLY TO SUCH MESSAGE WITH "STOP". YOUR CONSENT TO RECEIVE SMS MESSAGES IS NOT REQUIRED TO UTILIZE OUR SERVICES, COMPLY WITH LEGAL OBLIGATIONS, OR DEFEND OUR RIGHTS.

Evaluation of Employment Applications or Inquiries. In connection with a job application or inquiry, you may provide us with personal information about yourself, such as a resume or curriculum vitae. In addition to other uses disclosed in this Policy, we may use this personal information for the purpose of employment consideration, availability, or otherwise for us, our customers, and other third parties.

Other Uses. We may also use information about you (i) to track and analyze trends and usage in connection with our Services; (ii) to process and deliver contest and promotion entries and rewards; (iii) to protect our rights or property; (iv) to compare information for accuracy; (v) to verify your identity; (vi) to investigate and prevent fraud or other illegal activities; and (vii) for any other purpose disclosed to you in connection with our Services. We may also use your information to diagnose website technical problems, as well as to prevent, detect, mitigate, and investigate potential security issues, as well as fraudulent or illegal activity. In some instances, we may combine the personal information you have provided to us with other publicly available information. We may also receive or purchase data from third parties and combine this with information we have already collected. We use this combined information to update, expand, and analyze our marketing leads; identify new customers; and create more tailored advertising.

Fourth Does Not Sell Your Personal Information. Fourth does not sell your personal information to third parties and only discloses it as set forth in this Policy.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We share your information with our affiliates, partners, service providers, contractors, agents, vendors, and other third parties as needed to provide the Services, and for other purposes to which you consent.

Disclosure to Service Providers. We contract with other companies to provide services on our behalf, such as hosting websites, data storage and warehousing, sending out information, processing transactions, advertising, and analyzing our Services. We provide these companies with elements of your personal information that they need to deliver those services.

Disclosure to Partner Companies. From time to time, we may seek your permission to share your personal information with certain partner companies for their marketing purposes and will not share your personal information for such marketing purposes unless we have obtained your express consent to do so. In addition, in responding to a request made by you, we may share your personal information with companies that integrate with, distribute, or otherwise assist with or are involved with our service offerings.

Disclosure in Connection with Transactions. In connection with certain transactions, we may disclose some or all of your information to financial institutions, government entities, and shipping companies or postal services involved in fulfillment.

Disclosures in Connection with Acquisitions or Divestitures. Circumstances may arise where for strategic or other business reasons we decide to sell, buy, merge, or otherwise reorganize. Such a transaction or negotiations regarding such a transaction may involve the disclosure of your information to prospective or actual purchasers. It is our practice to seek reasonably appropriate protection for personal information in these types of transactions.

Disclosure for other reasons. Fourth will refer any request for disclosure of personal information by a law enforcement or government authority to you; however, we may disclose personal information if required to do so by law or in the good-faith belief that such action is necessary to comply with legal requirements or with legal process served on us, to protect and defend our rights or property or against deceptive activity, or in urgent circumstances to prevent, defend, or protect the personal safety, rights, or interests of any individual, the Services, or Fourth, its customers, employees, or affiliates. We may also disclose information at your direction or to otherwise fulfill the legitimate purposes provide for by law. Fourth will notify you of any request by law enforcement or government authority unless prohibited by law.

Aggregated Information. We may publish, share, distribute, or disclose personal information that has been aggregated with information from other users or otherwise de-identified in a manner that does not allow such data about you to be separated from the aggregate data and identified as originating from you, to third parties, including Fourth's partners, sponsors, and advertisers. Such information may help Fourth identify and analyze training, demographic, and psychographic trends and information, and report to third parties how many people saw, visited, or clicked on certain content, areas of the Services, ads, or other materials. We may also use such data for research purposes.

Personal Information You Post in Public Areas. When you post a message in a Fourth forum, chat room, review section, or customer feedback area, the information you post may be accessible to other users of the Services and the public. If you post personal information anywhere on the Services that is accessible to other users or the public, you are advised that such personal information can be read, collected, used, or disseminated by others and could be used to send you unsolicited information or for other purposes. Accordingly, you assume full responsibility for posting such information and agree that Fourth is not responsible in any way whatsoever for personal information you choose to post in these public areas. Please note that Fourth does not monitor and is not responsible for the content of any such forum, chat room, section, or area.

Third Party Sites & Integrations. Our Services may contain links to other sites or integrations, such as our integrations with our partners, distributors and sales affiliates, professional and government organizations, and publications. We also link to third-party providers that host, maintain, and operate on-line training curricula and other services. We are not responsible for the content, security, or privacy practices employed by other sites. Some third-party integrations with the Services may access or collect your information, including personal information. If you choose to use these, we will share your information with the integration partner to allow you to use the integration. We do not control integration partners' use of your information and their use of your information will be in accordance with their own policies. If you do not want your information to be shared with an integration partner, then you should not use the integration.

STORAGE & SECURITY

We use a variety of storage, transfer, and security procedures to help protect information from unauthorized access, use, or disclosure.

Storage. Personal information collected by Fourth may be stored and processed in your region, in the United States, the United Kingdom, and in any other country where Fourth or its affiliates, or service providers operate facilities. Fourth will retain your information as long as necessary for the purposes outlined in this Policy and for a commercially reasonable time thereafter, as permitted or required by applicable law, including for backup, archival, fraud prevention or detection, or audit purposes.

Data Transfer. The Services may be hosted or operated in countries other than the country in which you reside. Those countries may have different data protection laws and regulations from those that apply in your home country and you are solely responsible for complying with such laws and regulations. By accessing or using the Services, you authorize Fourth to transfer your data to and in the United States, the United Kingdom, and any other country where it operates. Please be aware that the governments, courts, and law

enforcement, security or agencies of a particular jurisdiction may be able to obtain access to or disclosure of your information as permitted by the laws of that jurisdiction.

Security. Fourth takes technological and organizational measures designed to protect your personal information against loss, theft, and unauthorized access, use, disclosure or modification. For example:

- we transmit data over secured communication channels using secure login credentials;
- all systems used to provide the Services are password protected;
- we store personal information you provide on computer systems with limited access that are located in facilities with limited access; and
- all Services usage is restricted on a per-user basis on the principle of least privilege.

Additionally, we rely on the security programs of our affiliates and service providers (e.g., Microsoft Azure) to protect personal information while stored in their respective controlled facilities. For more information on such security practices and processes, please see our Sub-Processors page at <https://www.fourth.com/legal/subprocessors/>. Please note that no method of electronic transmission or storage is 100% secure; therefore, we cannot guarantee absolute security of your personal information. For any services to which you login, it is your responsibility to ensure the security of your password and not to reveal this information to others. Fourth complies with applicable data protection laws, including applicable security breach notification requirements.

YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

Rights under Privacy Regulations. To the extent provided by the law of your jurisdiction, you may (i) have the right to access certain personal information we maintain about you and request details about how we process it, (ii) request certain information regarding our disclosure of personal information to third parties, including for their direct marketing purposes, (iii) request that we update or correct inaccuracies in that information, (iv) object to our use of your personal information, (v) ask us to block or delete your personal information from our database, and (vi) request to download the information you have shared on the Services. You may make these requests and any other inquiries about this Policy by emailing privacy@fourth.com, going to our Web Form at <http://help.fourth.com/> and submit a request, or calling us at **+1 (877) 720-8578**. Any such requests are subject to the protection of other individuals' rights and applicable law. Additionally, to help protect

your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain. You have the right to lodge a complaint about our privacy practice by contacting the relevant supervisory authority in the applicable country, which can be found on the European Commission website: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

Subscription Services Requests. An individual who seeks access to or a copy of personal information input to one of our subscription services, or who seeks to correct, amend, or delete such personal information, should direct their query to the Fourth subscriber (likely your employer) who is acting as the data controller.

ADDITIONAL PRIVACY INFORMATION

Children's Information. The Children's Online Privacy Protection Act was created to protect children under the age of 13 from unsuspecting acts or practices in conjunction with collecting, using, and disclosing any information about them. Our Services are not intended for anyone under the age of 13. If you are under 13, do not use or provide any information on or through our Services. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you are the applicable parent or guardian and believe we might have any personal information from or about a child under 13, please contact us so that we can delete it. The Services will never knowingly accept, collect, maintain, or use any personal information from a child under the age of 13.

California Privacy Rights under California's Shine-the-Light Law. Under California's "Shine the Light" law (Cal. Civ. Code § 1798.83), California residents who provide us certain personal information are entitled to request and obtain from us, free of charge, information about the personal information (if any) we have shared with third parties for their own direct marketing use. Such requests may be made once per calendar year for information about any relevant third-party sharing in the prior calendar year. California residents who would like to make such a request may submit a request in writing to privacy@fourth.com. The request should attest to the fact that the requester is a California resident, and provide a current California address.

CONTACT INFORMATION

You may reach our Privacy Team at privacy@fourth.com with any questions about this Policy or our privacy practices with regard to personal information.

Alternatively, you may reach us by addressing regular mail to the following addresses:

Headquarters
Fourth Enterprises, LLC.
Attn.: Privacy
6504 Bridge Point Parkway, Suite 425
Austin, TX 78730
United States

Europe and Middle East
Fourth Limited
Attn.: Privacy
90 Long Acre, Covent Garden
London WC2E 9RA
United Kingdom

If you prefer not to receive marketing communications from us, you may do so by clicking on the “Unsubscribe” link located on the bottom of our marketing emails. Please note that, as applicable, we will continue to send you necessary business communications after you have opted out, such as information about your transactions with Fourth, registered events, service announcements, and other important administrative communications.