



## KHOROS PRIVACY POLICY

EFFECTIVE DATE: 10/13/2020

LAST UPDATED: 10/13/2020



PRIVACY SETTINGS

### 1. SCOPE AND APPLICATION

This Privacy Notice describes how Khoros collects, uses, shares, and secures the Personal Data about individuals who use this web site ([khoros.com](http://khoros.com)) and our services. The following is a list of our current services: [Marketing](#), [Care](#), and [Communities](#). When we say “Personal Data,” we mean any data that could directly or indirectly be used to identify you or your household, ranging from (for example) your name and email address to the IP address of your device and the location from which you access this website.

This Privacy Notice describes how we collect, use, share, and secure the Personal Data that we collect when you access this website and our services. This Privacy Notice also describes how we handle Personal Data on behalf of our customers.

It is important to understand, however, that when we handle your Personal Data on behalf of one of our customers, we are doing so pursuant to the customer’s instructions as their data processor. If you want to know more details about that customer’s data protection policies, you should consult the customer’s privacy notice.

Read more about the scope of this Privacy Notice [here](#).

This Privacy Notice (“Privacy Notice”) applies to: (i) [www.khoros.com](http://www.khoros.com) (“Site”) and [community.khoros.com](http://community.khoros.com), owned and operated by Khoros, LLC and its wholly owned subsidiaries (“we,” “us,” or “Khoros”); and (ii) the online communities and social media management products that Khoros provides to its customers (“Customer(s)”) (“Service(s)”).

This Privacy Notice describes how Khoros: (i) collects, uses, shares, and secures your personal information that can be used, directly or indirectly, to identify you or your household (“Personal Data”) on this Site; and (ii) collects, uses, shares, and secures your Personal Data as a data processor on behalf of our Customers through the Services we provide to them.

The use of any information collected through our Services shall be limited to the purpose of providing the Service for which the Customer has engaged Khoros, as agreed in a signed contract between Khoros and Customer.

This Privacy Notice also describes your rights regarding the use of your Personal Data by Khoros, as well as the options available to you regarding how we communicate with you.

Khoros does not send unsolicited emails or sell any Personal Data that users may have submitted to us through our Site. In addition, for lead generation or marketing purposes, we may ask individuals interested in obtaining more information about Khoros products to voluntarily submit their contact information to us. For more information on the Personal Data that we collect, see the “What Personal Data do we collect?” section, below. For more information on how we use your Personal Data, see the “How do we use your Personal Data?” section below. Khoros is controller of your Personal Data as described in this Privacy Notice, unless explicitly stated otherwise.

This Privacy Notice does not apply to the extent that we process Personal Data while acting in the role of processor for our Customers. Such processing is governed by contracts that we have with our Customers.

For detailed information on how we process Personal Data on behalf of our Customers, please ask the applicable Customer directly. Khoros is not responsible for the data privacy or data protection practices of its Customers.

## 2. WHAT PERSONAL DATA DO WE COLLECT?

We collect two types of Personal Data about you: (1) Personal Data that we receive directly from you, which can include, but is not limited to: contact/demographic information: name; email address; company that you represent, and social media account information; and (2) Personal Data about you that we receive from others, which can include, but is not limited to: social Media & Other Information: content that you post on social media sites; information that you've provided to our customers; and information about your browsing habits on other websites.

Read more about the Personal Data that we collect about you [here](#).

Please note that some Personal Data we receive directly from you is provided to us automatically via technology, such as a cookie placed on your computer when you visit our Site.

Please also note that some parts of our website and services allow you to post or transmit comments, computer files, messages, and other materials. Please be careful about what Personal Data you choose to make public in these areas of our Site and Services.

We collect the following types of Personal Data:

Context	Types of Data	Legal Basis and Primary Purpose for Processing
Marketing Communications	Khoros receives user-submitted Personal Data from users wishing to be sent additional promotional information on Khoros products. Such Personal Data includes information such as name, phone number, company, title, and email address.	Khoros has a legitimate interest in communicating with its customers. In some circumstances, this processing may also be based upon your consent.
Information Posted to our Communities	We collect information, often including Personal Data, that is posted by users to the Khoros Community forum ("Khoros Community," also called the "Atlas") located at the Site, including content that is processed and stored within such community ("Community Content"). As part of our Services, we also collect information that users post to our Customers' online communities hosted by Khoros ("Customer Communities", each individually a "Customer Community"). <b>When personal data is posted in our Customer Communities, we process that data as a data processor or service provider.</b>	We process Personal Data on the Khoros Community or Atlas based upon your consent.
Account Registration	When you create an account on the Khoros Community or in a Customer Community, we collect Personal Data from you including your name, email address, phone	<i>We have a legitimate interest in providing account related functionalities to our users. Accounts can be used for easy checkout and to</i>

	number, and social media account information.	<i>save your preferences and transaction history.</i>
Office Visits	When you visit our offices, we collect Personal Data including name, phone number, company, title, and email address.	We have a legitimate interest in maintaining records of individuals who visit our office.
Event Attendance	When you register for and/or attend our events, we collect Personal Data including name, phone number, company, title, and email address.	We have a legitimate interest in maintaining records of individuals who attend our events.
Employment Applications	As part of its recruiting activities, Khoros also receives Personal Data from users submitting job application materials to be considered for Khoros employment (“Recruiting Data”). This Recruiting Data includes anything that an individual chooses to include, such as a resume or application, and typically consists of job history, education, personal interests and activities, name, email address, phone number, and residence address. Further, Khoros collects gender, race, and military status from employment candidates to assist Khoros in its equal employment opportunity compliance and related statistical tracking to help our diversity efforts. In connection with job screening activities, Khoros also requests Personal Data sufficient to have background checks conducted prior to hiring.	We also have a legitimate interest in collecting Recruiting Data in order to provide for an efficient workforce and to comply with relevant laws.
Social Media and Single Sign On Information	You can log in to our Site using sign-in services such as Facebook Connect or an Open ID provider. These services will authenticate your identity and provide you the option to share certain Personal Data with us, such as your name and email address, to pre-populate our sign up form. Services like Facebook Connect give you the option to post information about your activities on this Site to your profile page to share with others within your network.	We have a legitimate interest in ensuring users can effectively connect to our websites.
Cookies and other tracking technologies.	We also use cookies and collect some information passively such as the client browser type and IP address information. This information is gathered for all users to our website to track usage and provide a personalized experience. More information on cookies and similar technologies can be found in the section entitled “Use of cookies and other tracking technologies” below.	We have a legitimate interest in ensuring our website operates efficiently.
Third Party Tracking	We partner with a third party ad network to either display advertising on our Site or to manage our advertising on other sites. Our ad network partner uses cookies and Web beacons to collect information about your activities on this and other websites to provide you targeted advertising based upon your interests. If you	We have a legitimate interest in behavioral based advertising and in capturing website analytics.

	wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by clicking <a href="#">here</a> , or if you are located in the European Union you may click <a href="#">here</a> . Please note this does not opt you out of being served advertising. You will continue to receive generic ads.	
Information from Customers	We collect information that our Customers provide us to enable them to log on and use the Services. This data consists of Personal Data of their authorized users, company information and configuration, content, internal communications, and notes.	We have a legitimate interest in ensuring Customers can use our Services effectively.
Partner Information	We also collect information from partners and other websites concerning visitors of our Site and our Customers' websites ("Visitors"). For example, we ask or engage third parties to tell us additional information about Visitors, such as how they responded to our communication or promotions.	We have a legitimate interest learning more about how users respond to our communications and promotions.

In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. For example, Khoros collects data about individuals that is made available to Khoros and other third parties by social media sites such as Twitter, Facebook, Instagram, Pinterest, YouTube, Google, and others through APIs or social media monitoring technology ("Third Party Sites"). This data includes names, user IDs, social media handles, gender, and other information that individuals choose to make publicly available on social media sites. Khoros also monitors the public activities of individuals on social media sites, including posts, blogs, tweets, and profile information, including such social media messages directed at our customers (the "brands" that are interested in understanding their consumer customers in order to serve them better).

Note that any direct or indirect use of any social media network or other third party site through our Services is subject to your consent of the legal terms of that site, such as their respective terms of use and privacy policy. For your convenience, we've listed some of the most used sites with links to their main terms below (most terms also have additional policies linked to within the main terms). Note that we endeavor to keep these links updated, but they are subject to change. Regardless, you agree to locate and abide by all the third party terms that apply to you.

- Facebook:** <https://www.facebook.com/policies>
- Instagram:** <https://help.instagram.com/478745558852511/>
- Google:** <https://policies.google.com/privacy>
- YouTube:** <https://www.youtube.com/t/terms>

*In addition to the normal procedure for deleting stored data under YouTube's Terms of Service, please be aware that users can revoke access to their data via the Google security settings page, located at: <https://myaccount.google.com/permissions>*

- LinkedIn:** <https://www.linkedin.com/legal/user-agreement>
- Pinterest:** <https://policy.pinterest.com/en/terms-of-service>
- Twitter:** <https://twitter.com/en/tos>
- Tumblr:** <https://www.tumblr.com/policy/en/terms-of-service>
- WhatsApp:** <https://www.whatsapp.com/legal/>

Your continued access and/or use of this web site constitute your acceptance of the terms, as applicable, that are contained in the above third party notices.

Additionally, when a Customer provides or accesses information through one of our Services, we may receive information from the Customer's input of, in response to, or by way of interaction with, content generated by Customer's use of the Services, such as social media messaging, as well as from the Customer's website or Third Party Site. This may include information regarding a third party that was published on or provided to the Customer's website or Third Party Sites.

This Privacy Notice does not govern the collection of content by Third Party Sites that is not published or generated through the Services, except to the extent that we act as a processor with respect to such content. Our Customers are required to abide by the applicable policies and requirements of such Third Party Sites used in connection with the Services and when using information from Third Party Sites.

### 3. HOW DO WE USE YOUR PERSONAL DATA?

We use the Personal Data about you that we collect in order to fulfill a range of purposes, including:

- To provide this website and our services
- To maintain and improve this website and our services
- To provide personalized services, including behaviorally targeted ads
- To measure the performance of this website and our services
- To communicate with you
- To protect Khoros, you, our customers, and the public

To read more about how we use your Personal Data, click [here](#).

We collect and process your Personal Data for the following purposes:

- **To help us provide, maintain, and improve the Site and the Services, and to assess and enhance user experience on the Site and Services.** We conduct this processing on the basis of our legitimate interest in ensuring the optimal functionality of our Site and Services.

Information collected by Khoros from each Customer Community is used solely to provide the Services for that Community, to provide related Services to the customer who manages that Community, and as otherwise agreed in a contract between Khoros and the customer. Other information gathered is solely used to: (i) respond to a user's request for additional information on Khoros Services; (ii) provide, develop, enhance and support related Khoros Services; (iii) fulfill Khoros's legal obligations and defend Khoros's legal rights, as needed. We may also use a user's email address to send promotional or marketing materials on related Services, such as updates on the product line, but this is only after the user is a customer, a Service is requested by the user, or Khoros has some other pre-existing business relationship with the user. We use your IP address and browser-type information in the general administration of our website

In addition, we use the information that we gather from other social media sites to:

1. provide context to a brand, such as information about an individual's past interactions with that brand, and the individual's public profile information, to improve the quality of the brand's interactions with that consumer who is reaching out to them over social media,
2. assess each individual's general topics of interest (but excluding sensitive topics such as political or religious views),

3. measure their influence on social media by assigning a numerical value based on our proprietary algorithm which looks at frequency/ dates of activity, responses of other individuals to that activity, and the occurrence of certain key words and/or brand names, and,
4. allow brands to compare themselves to other brands in their industry by seeing aggregated statistics of the numbers of individuals who promote or detract from each brand based on the individuals' public social media activity.

Through our social media management services, we provide this information on individuals to the customer support and service representatives of the companies who are Khoros customers, the "brands", so that those representatives can provide support and service to their consumer customers more effectively, by triaging communications to address more urgent requests in priority order, and by understanding the interests of their consumer customers to provide more targeted support. We also provide aggregated statistic to the brands for competitive analysis purposes.

Khoros Care's use and transfer of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

Through our Khoros Community and Khoros JX Community platforms, we make social impact scores available for individuals who participate in the community to create more effective and interesting social interactions within the Community.

In the collection and use of information from other social media sites, we rely on our legitimate interests in providing services to our customers, and assisting them to provide better service to their customers, under applicable data privacy regulations, and balance those interests with the data privacy concerns of individuals. If you would like more information about our legitimate interests analysis, or have concerns that you would like us to address, please contact [privacy@khoros.com](mailto:privacy@khoros.com).

- **To ensure the security of our Site and Services.** We conduct this processing on the basis of our legitimate interest in promoting the security and safety of the Site and Services, and in protecting our rights and the rights of others.
- **To provide the necessary functionality of the Site and Services.** We conduct this processing to perform our contract with you for the use of our Site and Services. If we have not entered into a contract with you, we base this processing on our legitimate interest in providing you with the necessary functionality required during your use of our Site and Services.
- **To allow social sharing functionality on our Site and Services.**
- **To manage event registrations and attendance.** We conduct this processing based on our legitimate interest in providing our Customers and Users with valuable information on our Site and Services.
- **To register visitors to our offices.** We conduct this processing on the basis of our legitimate interest in protecting our offices and our confidential information against unauthorized access.
- **To identify new Customer opportunities.** We process your Personal Data to identify and assess new potential Customer opportunity to the extent that it is in our legitimate interest to ensure that we are meeting the demands of our Customers.
- **To manage contests or promotions.** If you register for one of our contests or promotions, we process your Personal Data to perform our contract with you. If we have no contract with you, we engage in this processing based on our legitimate interest in running successful contests or promotions for you.
- **To send you marketing communications.** We process your Personal Data to send you marketing information, product recommendations, and other non-transactional communications (e.g., marketing newsletters, telemarketing calls, SMS, or push notifications) about us and our affiliates and partners, including information about our products, promotions, or events as necessary to further our legitimate interest in conducting direct marketing or to the extent you have provided your prior consent. Please see the "Your rights and options regarding your Personal Data" section, below, to learn about your options regarding the processing of your Personal Data by Khoros for marketing purposes.
- **To display personalized advertising and content.** We process your Personal Data to conduct marketing research, advertise to you, provide personalized information about us on and off our Site and to provide other personalized content based upon your activities and interests to the extent it is necessary for our legitimate interest in advertising our Site and Services or, where necessary, to the extent you have provided your prior consent. As stated above, please see the "Your rights and options regarding your Personal Data" section, below, to learn about your options regarding the processing of your Personal Data by Khoros for marketing purposes.
- **To complete a merger or sale of assets.**
- **To protect the rights of Khoros and others.**

- **To evaluate candidates for employment.** In regard to candidates for employment, we use your Recruiting Data for purposes of evaluating candidates for potential employment with Khoros. We disclose your Recruiting Data to our private equity sponsor, Vista Equity Partners, and its affiliates, including Vista Consulting Group (collectively, “Vista”), for administration, research, database development and business operation purposes, in line with the terms of this Privacy Notice. Vista processes your personal information on the basis of its legitimate interests in overseeing the recruitment process and, if applicable, your employment relationship with Khoros. If you have consented to us doing so, we also share your personal information with other Vista portfolio companies for the purpose of being considered for other job opportunities in the pooling system, both inside and outside your home country (including inside and outside the EEA). Please find a full list of all Vista portfolio companies at: <https://www.vistaequitypartners.com/companies/>. For residents of EEA countries, when this requires us to transfer your personal information outside of the EEA, we comply with applicable EU data privacy rules.
- **To comply with legal obligations.** We process your Personal Data when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Data to protect our rights or is necessary for our legitimate interest in protecting against misuse or abuse of our websites, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes or to respond to lawful requests.
- **In accordance with your consent.**

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

Please note that Khoros may use and disclose data cleansed of all Personal Data so that it no longer can identify the Customer and/or user; and aggregated with similar data from other Khoros Customers (“Aggregated Data”) to determine and report Services usage patterns by Customers and users generally, and for any other legitimate purpose.

Information collected by Khoros from Customers is used solely to provide the Services and as otherwise agreed to in a contract between Khoros and the Customer.

Sometimes, our Customers have specific purposes for which they plan to use an individual user’s Personal Data, and our Customers describe those purposes at the point of collection. For example, a Customer may solicit a user’s feedback in order to improve services and products, respond to a user’s questions or comments, register in connection with a contest, giveaway, or drawing, respond to a request for a brochure, or to otherwise send information to the user. We may be asked to fulfill or assist with the fulfillment of the requirements associated with the point of collection purposes, but the responsibility to obtain any necessary consents remains with our Customers as the data controllers.

#### 4. HOW DO WE SHARE YOUR PERSONAL DATA?

We do not sell your Personal Data. We do share the Personal Data with third parties in a range of scenarios, including the following:

- To any third party with your consent
- To companies that provide services on our behalf to help us with business activities
- To outside parties when we believe that the disclosure is necessary to protect our rights, your rights, to protect your safety or the safety of others, investigate fraud, or comply with a law enforcement request

To read more about how we share your Personal Data, click [here](#).

As a matter of policy, we do not sell your Personal Data. We may disclose your Personal Data. We will only share your Personal



Data in the ways stated below:

- To any third party with your consent
- To companies that provide services on our behalf to help us with business activities. These companies are authorized to use your personal information only as necessary to provide these services to us. These services may include hosting, log file analysis, spam filtering, content delivery network services, video hosting, and/or serving targeted in-media content. For a complete list of our subprocessors (third parties who process or have access to our customers' personal data through our Services) visit <https://khoros.com/khoros-subprocessors>.
- In certain situations, Khoros may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, when required by law to comply with a subpoena or other similar legal processes.
- We may share your Personal Data when we believe in good faith that disclosure is necessary to protect our rights, your rights, protect your safety or the safety of others, investigate fraud, or comply with a law enforcement request.
- If Khoros becomes involved in a merger or acquisition, or any form of sale of some or all of its assets, we will provide notice via email and/or a prominent notice on our Site when your Personal Data becomes subject to a different privacy notice, of any change in ownership, uses of your Personal Data, and choices you may have regarding your Personal Data.
- In regard to Personal Data we collect from other social media sites, we disclose this Personal Data to our Khoros Customers as part of our Services to them to help them better serve their customers, as we describe above in the section called "How do we use your Personal Data?"
- In regard to your Recruiting Data, we disclose your Recruiting Data to Vista for the purposes described above, and, if you have consented to us doing so, we may also share your Personal Data with other Vista portfolio companies for the purpose of being considered for other job opportunities in the pooling system, as more fully described above. Also, in connection with the recruitment process, we transfer your Personal Data outside of the EEA to our sub-processors iCIMS and Criteria Corp., which provide applicant tracking services. iCIMS and Criteria Corp. Both transfers comply with the GDPR and ensure that your Personal Data is adequately protected while outside of the EEA.

For more information on international transfers of your Personal Data by Khoros, please see "International transfers of your Personal Data" below.

## 5. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

To facilitate our operations, we may transfer, store and process your Personal Data in jurisdictions other than where you live. Laws in these countries may differ from the laws applicable to your country of residence. For instance, if you're in the European Economic Area (EEA) or the United Kingdom, we ensure your Personal Data has an adequate level of protection when it's collected, transferred to, and stored outside the EEA or United Kingdom.

Some of the third parties to which we may disclose your Personal Data (discussed above) might be in a location outside the EEA or United Kingdom. In this case, we use certain legal mechanisms to ensure that the protection afforded your Personal Data is the same as the protection provided within the EEA or the United Kingdom, as the case may be.

We use the European Commission Standard Contractual Clauses as our legal transfer mechanism.

To read more about how we handle international transfers of Personal Data, click [here](#).

Some of the third parties listed in the previous section "How do we share your Personal Data?" may be located in countries located outside of the European Economic Area ("EEA") or UK that offer an adequate level of data protection, as determined by the European Commission. More information on those countries can be found here:

[https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)



Some of these third parties may be located in countries whose level of data protection has not been deemed adequate by the European Commission.

In the course of performing its Services, Khoros and its subprocessors may access and/or transfer Personal Data to (or from) these areas, pursuant to the European Commission Standard Contractual Clauses (“Clauses”).

Khoros strictly prohibits the entry of Sensitive Information into Khoros systems, except with the express prior written consent of Khoros in each instance.

## 6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will retain your contact information, including your name and email address, for as long as your account is active or as needed to provide the Services to you. If you wish to cancel your account or request that we no longer use your Personal Data to provide Services, please refer to “Your Rights and Options regarding your Personal Data” Section of this Privacy Notice.

Khoros may retain data, including Personal Data, in encrypted format held on back up media or other back up storage for disaster recovery purposes for up to ninety (90) days pending routine erasure cycles, and log files held for security reasons for up to twelve (12) months.

For further information on our Personal Data retention practices and policies, please see the [Khoros Data Retention and Media Destruction Policy for Customer Data](#). For additional questions on this topic, please contact us using the information contained in the “Contacting Us” section below.

## 7. YOUR RIGHTS AND OPTIONS REGARDING YOUR PERSONAL DATA

Depending where you live, you have certain rights related to your Personal Data. The rights available to you depend on our reason for processing the Personal Data in question. Please note that these rights are also subject to local data protection laws and regulations, and that these rights do not apply in all situations.

Your rights are as follows:

- **Right of access.** You have the right to know what Personal Data of yours we are processing.
- **Right to rectification.** You have the right to ask us to update, correct, or supplement that Personal Data that we hold about you.
- **Right to erasure.** You have the right to ask us to delete or erase your Personal Data from our systems.
- **Right to restriction of processing.** You have the right to request that we limit how we process your Personal Data.
- **Right to object.** You have the right to oppose our processing of your Personal Data.
- **Right to data portability.** You have the right to ask that we provide you with the Personal Data that we hold about you in a structured, machine-readable format. Under this right, you may either request that we provide the Personal Data directly to you, or you may request that we provide the Personal Data directly to a third party designated by you.

For more information about how to exercise your rights and options, click [here](#).

You may “opt-out” of having your Personal Data used for certain purposes, such as receiving promotional or other marketing material from us during the registration process, for downloading a whitepaper or signing up for our webcasts. Users who no longer wish to receive our updates or newsletters may opt-out of receiving these communications by following the instructions contained in the mailer or by emailing us at [marketing@khoros.com](mailto:marketing@khoros.com). Please include the term “OPT-OUT” in the subject line immediately followed by your email address.

You may access, correct, or request deletion of your personal information collected via this Site by emailing us at either:

(i) [privacy@khoros.com](mailto:privacy@khoros.com) if your request relates to Khoros' Community or Social Media Management products; (ii) [DataAccessRequest@spredfast.com](mailto:DataAccessRequest@spredfast.com) if your request relates to Khoros' Conversation, Intelligence, Experience, or Vault products; or (iii) [privacy@khoros.com](mailto:privacy@khoros.com) if you are not sure which Khoros product to which your request relates. You may also contact us at 1 (800) 235-0187. We will respond to your request within a reasonable timeframe.

Note that, as required by law, we will require you to prove your identity. We may verify your identity by phone call or email. Depending on your request, we will ask for information such as your name, email, social media pages that you have posted content to or interacted with, and/or your social media account profile or handle. We may also ask you to provide a signed declaration confirming your identity. Following a request, we will use reasonable efforts to supply, correct or delete personal information about you in our files.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require verification that you provided the authorized agent permission to make a request on your behalf. You must provide us with a copy of the signed permission you have given to the authorized agent to submit the request on your behalf and verify your own identity directly with us. If you are an authorized agent submitting a request on behalf of an individual you must attach a copy of the following information to the request:

1. A signed permission from the consumer in writing indicating that you have authorization to act on the consumer's behalf.
2. If you are a business, proof that you are registered with the Secretary of State to conduct business in California.

If we do not receive both pieces of information, the request will be denied.

We are unable to delete information accessed or provided through the Services if we do not control such information, such as information that originated through a social media network and is consequently controlled by such social media network, except to the extent that a copy of that data exists on our systems and with the permission of the data controller.

## 8. HOW DO WE SECURE YOUR PERSONAL DATA?

We follow generally accepted industry standards to protect the Personal Data submitted to us, both during transmission and once we receive it. Please keep in mind, however, that no method of transmission over the internet, or any method of electronic storage, is perfectly secure. In the event that we are required by law to inform you of a breach to your personal information, we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

To read more about our security policies, please click [here](#).

Khoros takes information security and privacy of Personal Data very seriously. We fully support and abide by the data privacy principals established in the EU Directive on Data Protection as well as all other applicable local privacy laws and regulations. Our security controls and mechanisms are based on the ISO 27001 global security management standard and we conduct external security audits and independent security testing on an annual basis.

Specifically for Customers:

The [Khoros Security Data Sheet](#) provides a summary of the security measures implemented throughout the organization to provide full transparency and a peace of mind for Khoros Customers that their Personal Data and information are in good hands.

For Customers who have a requirement to conduct their own security testing of the Khoros platform, the [Khoros Security Scanning Policy](#) provides an overview of the process and any associated restrictions.

If you have any questions about our security practices or security on our website, you can visit our security information page

at <https://khoros.com/khoros-security> or email us at [privacy@khoros.com](mailto:privacy@khoros.com).

## 9. COOKIES

Cookies or similar technologies are used by Khoros and our partners, affiliates, or analytics or service providers. These technologies are used in analyzing trends, administering this website, tracking users' movements around this website, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

To read more about how we use cookies and similar technologies, click [here](#).

We use cookies to remember users' settings (e.g. language preference) and for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our Site, but your ability to use some features or areas of our site may be limited.

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, referring/exit pages, browser type and operating system, date/time stamp, and/or clickstream data. We do not link this automatically collected data to other information we collect about you. For more information about cookies used by Khoros and a list of Khoros cookies [download the Khoros Cookies Datasheet](#).

## 10. CHANGES IN THIS PRIVACY NOTICE

This Privacy Notice may change from time to time, so please review it frequently for any updates or changes. If we make material changes to this Privacy Notice we will notify you by email (sent to the e-mail address specified in your account) or we will place a prominent notice on our Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. Our privacy policy includes an "effective" and "last updated" date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.

## 11. CONTACTING US

If you have any questions about this Privacy Notice, the practices of this Site, or your dealings with this Site, please call us at 1 (800) 235-0187, email us at [privacy@khoros.com](mailto:privacy@khoros.com) or write us at the following address:

Khoros, LLC  
1 Pier, Bay 1A  
San Francisco, CA 94111  
USA

To exercise your rights regarding your Personal Data (as described in the "Your Rights and Options regarding your Personal Data" section, above), or if you generally have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our Data Protection Officer:

Lillian Pang  
Taceo Limited  
Company registration number 11059214  
<http://www.taceo.co.uk/>

Telephone: +44 7740 105033

Email: [dpo@taceo.co.uk](mailto:dpo@taceo.co.uk)

Or, if you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge)

If you are located in the EEA and we have not able to address your complaint or concern to your satisfaction, you have the right to lodge a complaint with the supervisory authority that oversees Personal Data rules in your jurisdiction. For example, in the United Kingdom, your complaint should be directed to the Information Commissioner's Office (<https://ico.org.uk/>).

Khoros London Limited, a wholly owned subsidiary of Khoros, LLC, is based in the United Kingdom under the jurisdiction of the UK data protection authority the UK Information Commissioner's Office (ICO), and controls the export of Personal Data from the EEA to other Khoros affiliates, including Khoros, LLC. More information on ICO can be found on their homepage, which is located at <https://ico.org.uk/>.

## 12. ADDITIONAL INFORMATION

### COLLECTION OF PERSONAL DATA FROM CHILDREN

Our Site is not directed at children. We do not knowingly collect Personal Data from children under the age of 16. If you are a parent or guardian and believe your child has provided us with Personal Data without your consent, please contact us by using the information in the "Contacting Us" section, below, and we will take steps to delete such Personal Data from our systems.

Information for California Residents California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of information are collected, "sold" or transferred for an organization's "business purpose" (as those terms are defined under California law). You can find a list of the categories of information that we collect and share [here](#). Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing please submit a written request to us using the information in the "Contact Information" section below. We do not discriminate against California residents who exercise any of their rights described in this Privacy Policy.

#### Do Not Track

We do not currently recognize automated browser signals, which may include "Do Not Track" instructions.

### BLOGS

Our Site offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your Personal Data from our blog or community forum, contact us at [privacy@khoros.com](mailto:privacy@khoros.com). In some cases, we may not be able to remove your Personal Data, in which case we will let you know if we are unable to do so and why.

### SOCIAL MEDIA WIDGETS

Our Web site includes Social Media Features, such as the Facebook and Twitter buttons and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting

on our site, 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 Site. Your interactions with these Features are governed by the privacy notice of the company providing it.

## **ACCESSIBILITY**

This policy can be accessed using your browser's audio reader capabilities.

## **TESTIMONIALS AND COMMENT, IDEA, AND SURVEY SUBMISSIONS**

We display personal testimonials of satisfied Customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at [privacy@khoros.com](mailto:privacy@khoros.com).

We consider information such as answers to surveys, comments, ideas, and suggestions (in each case, which do not contain Personal Data) to be non-personal and do not classify such as Personal Data. Except as otherwise provided by applicable contracts with our Customers or a third party, Khoros is free to disclose and use such data or information without any obligation.

## **LINKS TO MORE DETAILED INFORMATION**

- [Security](#)
- [Disclaimer](#)
- [Policies and Guidelines](#)
- [Data Location and Subprocessor Guide](#)
- [Cookies Datasheet](#)
- [Personal Data Inventory for Subscription Services](#)
- [Data Retention and Media Destruction Policy for Customer Data](#)
- [GDPR Compliance](#)
- [Event Terms](#)

\*\*\*Separate page to be linked from the Information from California Residents Section\*\*\*

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether the following categories of personal information are collected, transferred for “valuable consideration,” or transferred for an organization’s “business purpose” (as those terms are defined under California law). We do not “sell” your personal information. The table below indicates the categories of personal information we collect and transfer in a variety of contexts. Please note that because this list is comprehensive, it may refer to types of information that we collect and share about people other than yourself. For example, while we transfer credit card or debit card numbers for our business purpose in order to process payments for orders placed with us, we do not collect or transfer credit card or debit card numbers of individuals that submit questions through our website’s “contact us” page.

Categories of Personal Information We Collect	To Whom We Disclose Personal Information for a Business Purpose
<p><b>Identifiers</b> – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name, social security number, driver’s license number, passport number or other similar identifiers.</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Data analytics providers</li> <li>• Data brokers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Joint marketing partners</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Social networks</li> </ul>
<p><b>Additional categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b> – this may include signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information.</p>	<ul style="list-style-type: none"> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> </ul>

<p><b>Characteristics of protected classifications</b> – this may include age, sex, race, ethnicity, physical or mental handicap, etc.</p>	<ul style="list-style-type: none"> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Professional services organizations, this may include auditors and law firms</li> </ul>
<p><b>Commercial information</b> – this may include information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Data analytics providers</li> <li>• Data brokers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Joint marketing partners</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Social networks</li> </ul>
<p><b>Internet or other electronic network activity information</b> – this may include browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Data analytics providers</li> <li>• Data brokers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Joint marketing partners</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Social networks</li> </ul>
<p><b>Geolocation data</b></p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Data analytics providers</li> <li>• Data brokers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Joint marketing partners</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> </ul>



	<ul style="list-style-type: none"> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Social networks</li> </ul>
<b>Audio, electronic, visual, thermal, olfactory, or similar information</b>	
<b>Professional or employment-related information</b>	<ul style="list-style-type: none"> <li>• Business partners</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Professional services organizations, this may include auditors and law firms</li> </ul>
<b>Non-public education information</b> (as defined in the Family Educational Rights and Privacy Act)	<ul style="list-style-type: none"> <li>• Business partners</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Professional services organizations, this may include auditors and law firms</li> </ul> <p>Social networks</p>
<b>Inferences drawn from any of the information listed above</b>	