

Updated 11.16.2020

PRIVACY POLICY

Choreography for Business, LLC respects the privacy of our users' information and content. We want to earn user trust by being careful and transparent about our use of your data.

This Privacy Policy explains what information Choreography for Business, LLC, a Massachusetts LLC ("Choreography for Business, LLC", "us", "we", or "our") collects about you and why, what we may do with that information and how we handle your information and content, including Personal Data (as defined below).

This Privacy Policy applies to the information obtained by us through your use of www.choreographyforbusiness.com (the "Site") and other products and services offered by Choreography for Business, LLC and its affiliates ("Services").

What information do we collect?

Choreography for Business, LLC may collect the following types of **Personal Data** (information that identifies you, your household, or your device, could be used to identify you, your household, or your device, or could be used to contact you), for the reasons set forth below:

Your name, email address and video.

- This lets us share your Virtual Presence Assessment with you directly via email, usually within 24 hours of your submitting a video. This information also helps us communicate with you about your use of our Services, product announcements and updates, as well as respond to your requests for assistance. In addition, we may use your **name and email** to send you email correspondence as further provided below.

Video Recordings

- If you choose to use our Virtual Presence Assessment service, you will have the opportunity to record and submit a short video to Choreography for Business.

Other User Generated Content:

- Other user content such as assessments, poll responses and other data-points provided through interaction with our site may be stored by Choreography for Business, LLC. We don't use this information for any purpose other than to provide you with the most

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relevant Virtual Presence Assessment and improve our understanding of your challenges in communicating over video conferencing.

- We may use third party providers to support payment and communications.

Log data

- As with most websites and technology services delivered over the internet, our web hosting provider may automatically collect data when you access or use our Site and/or Services and record it in log files. This log data may include the IP address, browser type and settings, the date and time of use, information about browser configuration, language preferences, cookie data, and information about your computer or mobile device, such as the type of hardware and software you are using.

Gathering this kind of information helps us administer our Services, provide convenient and direct communications and securely share with you your assessment. It also helps us improve and further develop the assessment product.

How do we use your information?

We may use the information we collect from you when you send in your video, vote in a poll, sign up for marketing communications or otherwise interact with the Site, in the following ways:

- To operate and improve Choreography for Business, LLC and services offered through the Site.
- Further development of software-based virtual presence coaching technology.
- To allow us to better service you in responding to your customer service requests.
- To quickly process your transactions.
- To administer a promotion, survey or other Choreography for Business, LLC features.
- For training, industry, communication or other research, analysis, demographic profiling, publications, norm development, and similar uses.

Personal Data or user content:

Choreography for Business, LLC does not sell or rent user information.

We do not share your information with third parties for the purpose of enabling them to deliver their advertisements to you.

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However, non-personally identifiable information may be provided to other parties for industry or communication research, analysis, demographic profiling, publications, norm development or other uses.

Do we review user content?

Choreography for Business, LLC maintains the right to review video content in order to deliver on the promise of a virtual assessment. Your Personal Data may also be viewed where necessary to protect the rights, property or personal safety of Choreography for Business, LLC and its users, or in order to comply with our legal obligations, such as responding to warrants, court orders, discovery obligations or other legal process.

Do we ever make any of your Personal Data or user content public?

No.

Information access and disclosure

Does Choreography for Business, LLC share my information?

We only disclose Personal Data to third parties when:

- We use service providers who assist us in meeting business operations needs, including hosting, delivering, and improving our Services. We also use service providers for specific services and functions, including email communication, customer support services, and analytics. These service providers may only access, process, or store Personal Data pursuant to our instructions and to perform their duties to us. You can request exact details of our service providers by contacting us at info@choreographyforbusiness.com.
- We have your explicit consent to share your Personal Data.
- We believe it is necessary to investigate potential violations of any contract we have entered with you, including the Terms of Service for any Service, to enforce those Terms of Service, or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, or potential threats against persons, property, or the systems on which we operate our Site and/or Services.

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- We determine that the access, preservation, or disclosure of your Personal Data is required by law to protect the rights, property, or personal safety of Choreography for Business, LLC and users of our Site and/or Services, or to respond to lawful requests by public authorities, including national security or law enforcement requests.
- We need to do so in connection with a merger, acquisition, bankruptcy, reorganization, sale of some or all of our assets or stock, public offering of securities, or steps in consideration of such activities (e.g., due diligence). In these cases some or all of your Personal Data may be shared with or transferred to another entity, subject to this Privacy Policy.

We may disclose anonymized, non-personally identifiable information publicly and to third parties – for example, as part of progress reports or comparisons for other users in connection with a Virtual Presence Assessment.

Choreography for Business, LLC does not share your Personal Data with third parties for the purpose of enabling them to deliver their advertisements to you.

Does Choreography for Business, LLC use cookies?

Cookies are small text files stored on your device and used by web browsers to deliver personalized content and remember logins and account settings. Choreography for Business, LLC does not use its own tracking cookies. Our payment partner, Stripe uses cookies to ensure that the site works properly, to detect and prevent fraud and understand how people interact with Stripe. For more information on these cookies, please refer to Stripe’s terms of service and privacy documentation.

Will Choreography for Business, LLC send me emails?

From time to time, we may want to contact you with information about product announcements, updates, and special offers. We also may want to contact you with information about products and services from our business partners. You may opt out of such communications at any time by clicking the “unsubscribe” link found within Choreography for Business, LLC emails and changing your contact preferences. All Choreography for Business, LLC users will continue to receive transactional messages related to our Services, even if you unsubscribe from promotional emails.

For EEA users: We only send marketing communications to users located in the EEA with your prior consent.

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Does Choreography for Business, LLC collect information from children?

Choreography for Business, LLC does not knowingly collect Personal Data from children under the age of 18. If we determine we have collected Personal Data from a child younger than 18 years of age, we will take reasonable measures to remove that information from our systems. If you are under the age of 18, please do not submit any Personal Data through the Site or Service. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide Personal Data through the Site without their permission.

Billing Information

Choreography for Business, LLC partners with [Stripe.com](https://stripe.com) to process all payments. We do not store any payment information beyond the transaction reports provided by Stripe.

Data storage, transfer, retention, and deletion

How is my Information stored?

Identifying information such as your name and email are collected and stored through our user contact service, [Mailchimp](https://mailchimp.com).

All video recordings are collected and stored through videomail.io, and are automatically deleted after 90 days. We may extract individual frames from video recordings. Extracted frames will be stripped of identifying data such as name and email address, and may be stored for longer than 90 days. Any such images and other user content will be stored on an encrypted cloud server via [Dropbox](https://dropbox.com).

We do not store any log data, though we may have access to it through our web hosting provider.

Please refer to the above-referenced service providers for more information about the storage and security characteristics of each service.

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If Choreography for Business, LLC learns of a data breach, we may attempt to notify you and provide information on protective steps, if available, through the email address that you have provided to us or by posting a notice on the Site.

How long is Personal Data retained ?

You can remove your Personal Data from Choreography for Business, LLC at any time by sending a request to info@choreographyforbusiness.com. However, we may keep some of your Personal Data for as long as reasonably necessary for our legitimate business interests, including fraud detection and prevention and to comply with our legal obligations including tax, legal reporting, and auditing obligations.

For EEA Users:

Choreography for Business, LLC, under the General Data Protection Regulation (“GDPR”), to the extent applicable, acts as a data controller (as defined in the GDPR) with respect to your Personal Data when it processes such information in connection with its lawful business purposes.

What is the lawful basis for the processing of my Personal Data?

We generally use, process, and store Personal Data on the basis of consent.

We may also process Personal Data on other bases permitted by the GDPR and applicable laws, such as when the processing is necessary for (i) compliance with our legal obligations, (ii) performance of a contract with the data subject, or (iii) protecting vital interests.

Will my Personal Data be transferred outside of the European Economic Area (EEA)?

Choreography for Business, LLC is based in the United States of America and that is where the processing of Personal Data we collect occurs. By providing us with Personal Data, you hereby consent to (i) our processing and disclosure of such Personal Data in accordance with this Privacy Policy; (ii) the transfer of such Personal Data to the United States; and (iii) our disclosure of such information in compliance with lawful requests by public authorities, including to meet national security or law enforcement requirements. The United States does not have an adequacy decision from the European Commission, which means that the Commission has not

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determined that the laws of the United States provide adequate protection for Personal Data. Although the laws of the United State do not provide legal protection that is equivalent to European Union data protection laws, we safeguard your Personal Data by treating it in accordance with this Privacy Policy. We take appropriate steps to protect your privacy and implement reasonable security measures to protect your Personal Data in storage.

What rights do I have, and how can I exercise them?

Under the GDPR, Individuals located in the EEA have the following rights in respect to their Personal Data:

- The right to access – You have the right to request that we provide copies of your Personal Data.
- The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.
- The right to erasure – You have the right to request that we erase your Personal Data, under certain conditions.
- The right to restrict processing – You have the right to request that we restrict the processing of your Personal Data, under certain conditions. This includes our use of your Personal Data to send you marketing emails. We only send marketing communications to users located in the EEA with your prior consent, and you may withdraw your consent at any time by clicking the “unsubscribe” link found within Choreography for Business, LLC emails and changing your contact preferences. Please note you will continue to receive transactional messages related to our Services, even if you unsubscribe from marketing emails.
- The right to object to processing – You have the right to object to our processing of your Personal Data, under certain conditions.
- The right to data portability – You have the right to request that we transfer the information that we have collected to another organization, or directly to you, under certain conditions.
- If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us pursuant to the contact information listed below.

You may exercise your data protections rights provide any other questions, comments, complaints or requests regarding, by contacting us at:

Choreography for Business, LLC
Attention: Data Protection Officer
94 St. Botolph Street, Apt. 4

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Boston, MA 02116

617-981-3292

info@choreographyforbusiness.com

How do I contact the appropriate authority?

Should you wish to file a complaint concerning our processing of your Personal Data with your national (or in some countries, regional) data protection authority, the European Union Commission provides a list [here](#).

Will this Privacy Policy ever change?

As Choreography for Business, LLC evolves, we may need to update this Policy to keep pace with changes in our Site and Services, our business, and laws applicable to us and you. We will, however, always maintain our commitment to respect your privacy. We will notify you of any material changes that impact your rights under this Policy by email (to your most recently provided email address) or post any other revisions to this Policy, along with their effective date, in an easy-to-find area of the Site, so we recommend that you periodically check back here to stay informed of any changes. Please note that your continued use of Choreography for Business, LLC after any change means that you agree with, and consent to be bound by, the new Policy. If you disagree with any changes in this Policy and do not wish your information to be subject to it, you will need to delete your Choreography for Business, LLC account.