

Ividence, Inc. SAFE HARBOR PRIVACY POLICY

Ividence, Inc. respects individuals' privacy, and strives to collect, use and disclose personal information in a manner consistent with the laws of the countries in which it does business. This Safe Harbor Privacy Policy (the "Policy") describes the privacy principles Ividence follows with respect to personal information it receives from the European Economic Area.

SAFE HARBOR OVERVIEW

The United States Department of Commerce and the European Commission have agreed on a set of data protection principles and frequently asked questions to enable U.S. companies to satisfy European Union ("EU") law requiring that Personal Data transferred from the EU to the United States be adequately protected (the "U.S.-EU Safe Harbor"). The European Economic Area (the "EEA"), which includes all member states of the EU, Iceland, Liechtenstein and Norway, has recognized the U.S.-EU Safe Harbor as providing adequate protection of Personal Data (2001 O.J. (L 45) 47).

Consistent with its commitment to protect personal privacy, Ividence adheres to the principles set forth in the U.S.-EU Safe Harbor (the "Safe Harbor Principles").

SCOPE

This Policy applies to all Personal Data received by Ividence in the United States from the EEA, either directly from individuals or from its affiliates or publishers.

DEFINITIONS

"Agent" means any third party that processes, collects or uses Personal Data under the instructions of, and solely for, Ividence or to which Ividence discloses Personal Data for use on Ividence's behalf.

"Personal Data" means any information or set of information that (1) is transferred from the EEA to the United States, (2) recorded in any form and (3) identifies or could be used by or on behalf of Ividence to identify any individual. Personal Data does not include anonymized information, aggregated information or publicly available information that has not been combined with non-public personal information. Personal Data excludes all Sensitive Personal Data (as defined below).

"Sensitive Personal Data" means Personal Data that: (a) reveals race; ethnic origin; political opinions, religious, ideological or philosophical beliefs; or trade union membership, views or activities; (b) concerns health or sex life, information about social security benefits, or information on criminal or administrative proceedings and sanctions other than in the context of pending proceedings or (c) is received from a third party where that third party identifies and treats the information as sensitive personal data pursuant to the EU Data Directive.

"Ividence," "we," "our" or "us" means Ividence, Inc., its successors, affiliates, subsidiaries, divisions and groups in the United States.

PRIVACY PRINCIPLES

The privacy principles set forth in this Policy have been developed based on the Safe Harbor principles.

NOTICE: When Ividence collects Personal Data directly from individuals in the EEA, it will inform them about the purposes for which it collects and uses Personal Data about them, the types of non-Agent third parties to which Ividence discloses that Personal Data, the choices and means, if any, Ividence offers individuals for limiting the use and disclosure of their Personal Data, and how to contact Ividence about its practices concerning Personal Data.

Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Data to Ividence, or as soon as practicable thereafter, and in any event before Ividence uses or discloses the information for a purpose other than that for which it was originally collected.

Purposes for which we may collect and use Personal Data from our employees and job applicants include:

- Carrying out human resources functions such as training, implementing career and succession planning, administering employee contracts, evaluating employees, implementing employment-related actions and obligations and providing employment benefits and related information.
- Enabling Ividence and its employees to contact one another using an employee's work telephone and fax numbers, e-mail address or mailing address.
- Administering compensation, bonus and benefits plans and other employment matters.
- Arranging, booking and implementing employees' travel plans and arrangements for business related purposes.
- Enabling Ividence to maintain building security and employee security, health and safety.
- Transferring Personal Data in connection with Ividence's legal, regulatory compliance and auditing purposes.
- Facilitating Ividence's internal administrative and analytics purposes, such as project staffing, headcount and statistics initiatives.
- Complying with Ividence's legal obligations, policies and procedures.

Purposes for which we may collect and use Personal Data from our customers, consumers and other nonemployees include:

- Responding to individual's inquiries, including in connection with prospective employment at Ividence, and administering and process an individual's employment application to Ividence.
- Communicating to individuals about our products, services and related issues.
- Notifying individuals of, and administering, contests, sweepstakes, promotions and other offers.
- Evaluating the quality of our products and services.
- Allowing individuals to register for our Web sites, online communities and other social networking services, and administering and processing these registrations.
- Enhancing or customizing your experience on our Web sites.
- Transferring Personal Data in connection with Ividence's legal, regulatory compliance and auditing purposes.
- Facilitating Ividence's internal administrative and analytics purposes, maintaining and administering Ividence's websites and complying with Ividence's legal obligations, policies and procedures.

Where Ividence receives Personal Data from its subsidiaries, affiliates, publishers or other entities in the EEA, it will use and disclose such Personal Data in accordance with the notices provided by such entities and the choices made by the individuals to whom such Personal Data relates.

We may share Personal Data within the U.S. family of Ividence companies. We may also disclose Personal Data to our Agents in the United States and other third parties when required to do so under law or by legal process. We do not use Personal Data for purposes incompatible with the purposes for which the information was originally collected without notifying the relevant individuals of such uses and offering an opportunity to opt out.

CHOICE: Ividence will allow individuals whose Personal Data is collected in the EEA and transferred to the United States to choose (by either opt-out or opt-in) whether their Personal Data can be (1) disclosed to a third party that is not an Agent or (2) used for a purpose other than the purpose for which it was originally collected or subsequently authorized by that individual.

Ividence will provide individuals with clear and conspicuous, readily available, and affordable mechanisms to exercise these choices.

ONWARD TRANSFER: Ividence will obtain assurances from its Agents that they will safeguard Personal Data in a manner consistent with this Policy. Examples of appropriate assurances that may be provided by Agents include: (1) the Agent's certification that they participate in the U.S.-EU Safe Harbor, (2) a contract requiring the Agent to provide at least as the same level of protection as is required by the Safe Harbor Principles, (3) being subject to the EU Data Protection Directive (EU Directive 95/46/EC) or another law providing an adequate level of privacy protection. Where Ividence has knowledge that an Agent is using or disclosing Personal Data in a manner contrary to this Policy, Ividence will take reasonable steps to prevent or stop the use or disclosure.

SECURITY: Ividence will take reasonable precautions to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration or destruction. As necessary, Ividence will take additional precautions regarding the security of Sensitive Personal Data. While Ividence strives to secure Personal Data, even reasonable security measures do not guarantee the security of any information, and Ividence cannot guarantee that the Personal Data it seeks to protect will be protected in all circumstances, including those beyond its reasonable control. Records containing Personal Data are considered Ividence property and should be afforded confidential treatment at all times, regardless of whether these records are in electronic or paper form.

DATA INTEGRITY: Ividence will use Personal Data only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Ividence will also take reasonable steps to ensure that Personal Data is relevant to its intended use, accurate, complete and current.

ACCESS: Upon request and in accordance with the Safe Harbor Principles, Ividence will grant individuals reasonable access to their Personal Data that is held by Ividence. In addition, Ividence will take reasonable steps to permit individuals to correct, amend or delete Personal Data that is demonstrated to be inaccurate or incomplete. Ividence may limit or deny access to Personal Data as permitted by the Safe Harbor Principles. For example, Ividence may limit an individual's access to Personal Data where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy or where the legitimate rights of persons other than the individual would be violated.

With respect to Personal Data of employees and job applicants, Ividence will provide such access either directly or through the employer located in the EEA.

ENFORCEMENT: Ividence has established procedures for periodically verifying its compliance with the Safe Harbor Principles, including an annual self-assessment of its relevant privacy practices to confirm the accuracy of, and verify its adherence to, this Policy. Ividence will investigate suspected infractions of this Policy. Any employee that Ividence determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

Any questions or concerns regarding the use or disclosure of Personal Data should be directed to Director, Global Compliance at the address listed below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Data in accordance with the Safe Harbor Principles. For complaints that cannot be resolved through our internal process, Ividence will participate in the dispute resolution procedures of the panel established by the European data protection authorities to resolve disputes pursuant to the Safe Harbor Principles

CONTACT INFORMATION5

Please submit questions or comments regarding this Policy or our practices concerning Personal Data to:

Director, Global Compliance
Ividence Inc.
1700 Montgomery St
Suite #209
San Francisco, CA 94111
privacy@ividence.com

LIMITATIONS

Ividence's adherence to the Safe Harbor Principles may be limited by any applicable legal, regulatory, ethical or public interest consideration and as expressly permitted or required by any applicable law, rule or regulation. Examples of such limitations include, without limitation, exceptions to the opt-in requirements for Sensitive Personal Data as permitted by Commission Decision 2000/520/EC of 26 July 2000, exceptions to access as permitted by the Safe Harbor Principles, or under applicable EEA member state. Ividence may also sell, transfer or otherwise disclose Personal Data reasonably related to the sale, assignment, transfer or other disposition of all or part of our business, subject to and in accordance with applicable law.

CHANGES TO THIS POLICY

This Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. Appropriate notice will be given concerning any such amendment.

EFFECTIVE DATE

This Policy is effective as of January 1st, 2012.