IC3D Privacy Policy

Last Updated: 23 July 2021
This Privacy Policy (“Policy”) explains the information collection, use, and sharing practices of IC3D Inc. (“IC3D,” “we,” “us,” and “our”). Before you submit any personal information to IC3D, please carefully review this Privacy Policy. By engaging with any of the Services (defined below), you understand that your information may be collected, used, and disclosed as outlined in this Privacy Policy. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT USE THE SERVICES.

1. Scope of the Policy

This Policy describes and governs the collection, use, and sharing practices of IC3D with respect to your personal information. Unless otherwise noted, this Policy applies to all services, products, websites, or events (collectively referred to as “Services”) provided, created, or controlled by IC3D. Where different privacy terms apply with regard to a particular Service, such terms will be conspicuously provided in conjunction with that Service.

This Policy will notify you of the following:

- What personally identifiable data is collected from you, how it is used, and with whom it may be shared.
- What choices are available to you regarding the use of your personal information.
- The security procedures in place to protect the misuse of your personal information.

2. Information We Collect

IC3D collects personal information in multiple ways, including when you provide information directly to us; when we passively collect information from you, such as from your browser or device; and from third parties.

Information You Provide Directly to Us

We will collect any information you provide to us. We may collect information from you in a variety of ways, such as when you: create an online account, make a purchase, register for an event, contact us or provide feedback, or subscribe to our newsletter. This information may include but is not limited to your name, email address, phone number, mailing address, and payment information. We may also collect additional demographic and other information about you in connection with our events (e.g., photo, geographic location, and your social media handles), and the provision of this information to us by you is optional.
Information that Is Automatically Collected

Device/Usage Information

We may automatically collect certain information about the computer or devices (including mobile devices or tablets) you use to obtain or access the Services. As described further below, we may collect and analyze (a) device information such as IP addresses, location information (by country and city), unique device identifiers, IMEI and TCP/IP address, browser types, browser language, operating system, mobile device carrier information, and (b) information related to the ways in which you interact with online Services, such as referring and exit web pages and URLs, platform type, the number of clicks, domain names, landing pages, pages and content viewed and the order of those pages, statistical information about the use of the Services, the amount of time spent on particular pages, the date and time you used the Services, the frequency of your use of the Services, error logs, and other similar information. As described further below, we may use third-party analytics providers and technologies, including cookies and similar tools, to assist in collecting this information.

Cookies and Other Tracking Technologies

We also collect data about your use of our online Services through the use of Internet server logs and online tracking technologies, like cookies and/or tracking pixels. A web server log is a file where website activity is stored. A cookie is a small text file that is placed on your computer when you visit a website, that enables us to: (a) recognize your computer; (b) store your preferences and settings; (c) understand the web pages of the Services you have visited and the referral sites that have led you to our Services; (d) enhance your user experience by delivering content specific to your inferred interests; (e) perform searches and analytics; and (f) assist with security administrative functions. Tracking pixels (sometimes referred to as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in websites, online ads and/or email, and that are designed to provide usage information like ad impressions or clicks, measure popularity of the Services and associated advertising, and to access user cookies. We may also use tracking technologies in our icons that you can embed on other sites/services to track the website addresses where they are embedded, gauge user interaction with them, and determine the number of unique viewers of them. If you receive email from us, we may use certain analytics tools, such as clear GIFs, to capture data such as whether you open our message, click on any links or banners our email contains, or otherwise interact with what we send. This data allows us to gauge the effectiveness of our communications and marketing campaigns. As we adopt additional technologies, we may also gather additional information through other methods.

Please note that you can change your Internet browser settings to notify you when a cookie is being set or updated, or to deactivate cookies altogether. Please consult the “Help” section of your browser for more information. If you choose to deactivate cookies, you may continue to use certain parts of our online Services. However, some useful features may not work anymore, depending on which cookies you deactivate. Please note that if you have disabled one or more
cookies, we may continue to use the information that was collected by such cookies before they were deactivated. However, we will cease to collect any information via the opted-out cookie once a cookie has been deactivated.

**Information from Third Parties**

We may also collect personal information about you or others through third parties. For example, if you interact with us through a venue controlled by a third party (e.g., visit our booth at a trade show, or contact us through mfg.com or other third-party websites), we may collect information about you from the third party. To the extent permitted by law, we may also collect publicly available information from third parties, including public records and social media platforms. Depending on the source, this information collected from third parties could include name, contact information, demographic information, information about an individual’s employer, information to verify identity or trustworthiness, and information for other fraud or safety protection purposes.

3. How We Use Your Information

We may use the personal information we collect from and about you to:

- Fulfill the purposes for which you provided it;
- Provide and improve our Services, including to develop new features or services, take steps to secure the Services, and for technical and customer support;
- Process purchases from IC3D;
- Host events and programs;
- Fundraise or accept donations, such as during our annual Toys for Tots campaign;
- Send you information about your relationship or transactions with us, account alerts, or other communications, such as newsletters to which you have subscribed;
- Process and respond to your inquiries or to request your feedback;
- Conduct analytics, research, and reporting, including to synthesize and derive insights from your use of our Services;
- Evaluate job candidates during our hiring process; and
- Comply with the law and protect the safety, rights, property, or security of IC3D, the Services, our users, and the general public.

Although we may use your personal information in various ways that support our business and the provision of Services to you, we are not in the business of making money from your data. **Therefore, we will NOT sell or rent your personal information.** However, your data may be an incidental part of other business transactions (see Business Transfer in #4 below).

We may combine information that we collect from you and about you (including automatically collected information) with information we obtain about you from third parties, and use such combined information in accordance with this Privacy Policy.
We may aggregate and/or de-identify information collected through the Services. We may use de-identified and/or aggregated data for any purpose, including without limitation for research and marketing purposes.

4. Security Measures

We have implemented technical, physical, and organizational security measures to protect against the loss, misuse, and/or alteration of your information based on the sensitivity of the information that we collect and store.

Wherever we collect sensitive personal information (such as credit card data) online, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser, or looking for "https" at the beginning of the address of the web page. While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

Unfortunately, we cannot and do not guarantee that any of these measures will prevent every unauthorized attempt to access, use, or disclose your information since, despite our best efforts, no Internet and/or other electronic transmissions can be completely secure.

5. Data Retention

We retain the information we collect for as long as necessary to fulfill the purposes set forth in this Privacy Policy or as long as we are legally required or permitted to do so. Information may persist in copies made for backup and business continuity purposes for additional time.

6. When We Disclose Your Information

IC3D may disclose and/or share your personal information under the following circumstances:

- **Consent.** We may disclose your information to any third parties based on your consent to do so.

- **Service Providers.** We may disclose your information with third parties who perform services on behalf of IC3D, including without limitation, payment processing, event management, candidate selection, marketing, customer support, data storage, data analysis and processing, and legal services.

  For example, when you purchase an item on our website, we may share your information with the third parties designated to process your payment and make delivery of the item to you. Or, when you register for an event, we may share your
information with vendors, third party contractors, partner organizations, and volunteers for the purpose of organizing and running the event and related activities.

- **Legal Compliance and Protection of IC3D and Others.** We may disclose your information if required to do so by law or on a good faith belief that such disclosure is permitted by this Privacy Policy or reasonably necessary or appropriate for any of the following reasons: (a) to comply with legal process; (b) to enforce or apply this Privacy Policy or other contracts with you, including investigation of potential violations thereof; (c) to respond to your requests for customer service; and/or (d) to protect the rights, property, or personal safety of IC3D, our agents and affiliates, our users, and the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.

- **Business Transfers.** As we continue to develop our business, we may engage in certain business transactions, such as the transfer or sale of our assets. In such transactions, (including in contemplation of such transactions, e.g., due diligence) your information may be disclosed. If one of IC3D’s assets is sold or transferred to a third party, customer information associated with that asset (including your email address) would likely be part of the transferred business asset.

- **Affiliated Companies.** We may disclose your information with current or future affiliated companies and affiliated charitable organizations.

- **Aggregate/De-identified Information.** We may disclose de-identified and/or aggregated data for any purpose to third parties, including advertisers, promotional partners, and/or others.

7. Online Analytics

We may use third-party web analytics services on our Services to collect and analyze the information discussed above, and to engage in auditing, research, or reporting. The information (including your IP address) collected by various analytics technologies described in the “Cookies and Other Tracking Technologies” section above will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Services, including by noting the third-party website from which you arrive to our online Services, analyzing usage trends, assisting with fraud prevention, and providing certain features to you.

8. Legal Basis for Processing Personal Data

The laws in some jurisdictions require companies to tell you about the legal grounds they rely on to use or disclose information that can be directly linked to or used to identify you. To the extent those laws apply, our legal grounds for processing such information are as follows:
• To Honor Our Contractual Commitments to You. Much of our processing of information is to meet our contractual obligations to provide services to our customers and other users of our Services.

• Legitimate Interests. In many cases, we handle information on the ground that it furthers our legitimate interests in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals, these include:
  o Customer service
  o Marketing, advertising, and fundraising
  o Protecting our users, personnel, and property
  o Managing user accounts
  o Organizing and running events and programs
  o Analyzing and improving our business
  o Managing legal issues

We may also process information for the same legitimate interests of our users and business partners.

• Legal Compliance. We may need to use and disclose information in certain ways to comply with our legal obligations.

• Consent. Where required by law, and in some other cases where legally permissible, we handle information on the basis of consent. Where we handle your information on the basis of consent, you have the right to withdraw your consent in accordance with applicable law.

9. International Transfers

Our computer systems are currently based in the United States and the majority of our contractors are based in the United States. As described above in the “When We Disclose Your Information” section, we may share your information with trusted service providers or business partners in countries other than your country of residence, including the United States, in accordance with applicable law. This means that some of your information may be processed in the United States, which may not offer the same level of protection as the privacy laws of your jurisdiction. By providing us with your information, you acknowledge any such transfer, storage or use.

If we provide any information about you to any third-party information processors located outside of the EEA, we will take appropriate measures to ensure such companies protect your information adequately in accordance with this Privacy Policy and other data protection laws to govern the transfers of such data.
10. Your Choices and Data Subject Rights

Depending on the jurisdiction where you reside, you have various rights with respect to our collection and use of your personal information. Those rights may include the following:

- Opting out of any future contact from us.
- Requesting what personal information we have about you, if any.
- Changing/correcting any personal information we have about you.
- Requesting a portable copy of personal information we have about you, if any.
- Having us delete any personal information we have about you.
- Requesting the restriction of processing any personal information we have about you.
- Withdrawing your consent for processing of your personal information.
- Expressing any concern you have about or object to our use of your personal information.

To exercise these rights, please contact us with the nature of your request by using the information on the Contact Us page of our website. If you have registered for an online account with us, you can update your account information or adjust certain communication and data preferences by logging into your account and updating your settings.

- CA residents: If you are a resident of California, you may have certain legal rights provided by the California Consumer Privacy Act (CCPA). You can learn more about these rights on the California Attorney General’s [CCPA webpage](#).
- EU Data Subject Rights: Individuals in the European Economic Area and other jurisdictions have certain legal rights provided by the EU General Data Protection Regulation (GDPR). To learn more about the rights provided by this regulation, visit the EU’s [GDPR website](#).

11. Children

The Services are intended for users over the age of 18 and are not directed at children under the age of 13. If we become aware that we have collected personal information (as defined by the Children’s Online Privacy Protection Act) from children under the age of 13, or personal data (as defined by the EU GDPR) from children under the age of 16, we will take reasonable steps to delete it as soon as practicable.

12. Third-Party Links and Services

Our online Services may contain links to third-party websites (e.g., social media sites like Facebook and Twitter), third-party plug-ins (e.g., the Facebook “like” button and Twitter “follow” button), and other services. If you choose to use these sites or features, you may disclose your personal information not just to those third-parties, but also to their users and the public more generally depending on how their services function. IC3D is not responsible for the content or privacy practices of such third-party websites or services. The collection, use and
disclosure of your information will be subject to the privacy policies of the third-party websites or services, and not this Privacy Policy.

13. Changes to this Privacy Policy

We continue to evaluate and may make changes to the Privacy Policy accordingly. We will post any changes here and revise the date last updated above. We encourage you to check this page periodically for updates to stay informed on how we collect, use and share your information. If we make material changes to this Privacy Policy, we will provide you with notice as required by law.

14. Questions About this Privacy Policy

If you have any questions about this Privacy Policy or our privacy practices, please contact us with your questions by using the information on the Contact Us page of our website.