



Leveragepoint Innovations Inc. Privacy Policy

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LeveragePoint Innovations, Inc. (“LeveragePoint”, the “Company”, “we, or “our”) takes your privacy and the security of your information very seriously, and we encourage you to read this privacy policy carefully to understand how we collect and handle your information. This policy describes the type of information our LeveragePoint for Value Management online subscription software tool (the “Tool”) and our corporate website (www.LeveragePoint.com) collects from you, and the steps we have taken to protect that information.

By using the Tool or our website, you consent to the data practices described in this privacy policy. If you do not agree with the data practices described in this privacy policy, you should not use the Tool or website.

“Personal information” refers to any information that you submit to us that identifies you personally. LeveragePoint collects personal information you share with us when using our Tool. We use this personal information to provide you with login-in access to our Tool, to improve the relevance of our communication, and to enhance the quality of our Tool. This personal information includes your name and email address, which may potentially include your company name, as well as your IP address. When you use our website, the information we collect from you may include your name, email address, phone number, company, and IP address.

Here are some links to help you navigate this privacy policy:

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If you have additional privacy or information security questions after reading this privacy policy, please contact us at Privacy@LeveragePoint.com.

WHAT DOES LEVERAGEPOINT DO?

We offer a software-as-a-service online solution tool (the “Tool”) that aligns product, pricing, marketing, sales enablement and sales teams around creating, communicating and capturing value. Our Tool allows these teams to collaborate internally around building a value-based strategy then publish a customer-facing, dynamic, value proposition that clearly communicates the value of their offering in the first customer meeting.

WHAT INFORMATION DOES LEVERAGEPOINT COLLECT FROM ME?

LeveragePoint collects certain information from you when you share that information with us in order to become a user of our Tool and when you use our website.

- *When you use the tool:* When the company you work for sets you up as a user on our Tool, we ask for and collect personal information such as your name and email address, which may possibly include your company name. In addition, we automatically collect your IP address. If you have a question about our Tool and submit it through an email to TechSupport@LeveragePoint.com, we use your email address and name to populate the customer support ticket which puts you in our queue to assist you. If you have a question about our Tool and click on the customer support box while in the Tool, we ask you for your name and email address.
- *When you visit our website:* When you visit our website and request a download of content, subscribe to our blog or newsletter, register for a webinar, request a demo from us, interact with our website’s chat function (“Drift”), or fill out a “Contact Us” form, we ask for and

collect personal information from you such as your name, email, phone number, and company. In addition, we automatically collect your IP address.

- *Information from Third Parties:* LeveragePoint may also collect information about you from third parties, including marketing partners, contact/ mailing list providers, tradeshow/live events that we participate in, and publicly available information from sources such as social media.
- *Analytics Information:* We may also collect certain types of non-personal information whenever you visit our Tool or website. By “Site Visit Information” we mean information that does not identify you personally, such as your device information, browser information, and general geographic information. This information helps us operate our website, our Tool, and provide other services, including technical support.

Our Tool has Tool-specific analytics built into it which generate usage reports for customer management and LeveragePoint management. A customer configuration can be set up with restrictions on usage reporting for groups of a specified minimum size. We also use Google Analytics for understanding user behavior in the Tool; the analytics data captured includes company name, user demographics, page views, and events.

LeveragePoint has partnered with select analytics partners, including Google Analytics, Pardot, CrazyEgg and Drift (“Analytics Partners”) to collect information about how our website is used. Our Analytics Partners may collect information about how many times you visit our website, what you visit when you explore our website, what parts of our website you access, and what other sites you visit before and after visiting our website. You can learn more about cookies and our Analytics Partners by visiting our website at <https://www.leveragepoint.com/about-us/security/cookie-policy/>.

WHAT DOES LEVERAGEPOINT DO WITH THE INFORMATION IT COLLECTS?

We use the information we collect from you in the LeveragePoint Tool to:

- Set you up as a user of the Tool;
- Assist you with questions arising from your use of the Tool;
- Log your Tool activity for potential technical support or for archive retrieval;
- Notify you of actions in the Tool such as a password reset;
- Provide you with notification of collaboration between users in the Tool; and
- Improve the quality and functionality of the Tool.

We use the information we collect from you in the LeveragePoint website and receive from third parties to:

- Include you in our database in order to provide you with marketing communications about blogs, webinars or other opportunities sponsored by us;
- Provide you with downloads of information you have requested from our website;
- Contact you as requested by you at our website;
- Contact you in cases where there is either consent from you or if we believe there is a legitimate interest in business discussions regarding our Tool; and
- Improve the quality and functionality of our website.

Related analytics:

We also use non-personal information (site visit information and related analytics) to improve the quality and functionality of our website and our Tool, to provide the customer administrators of our Tool with usage reports, and to generate reports to monitor customer usage.

Legal and law enforcement requests:

LeveragePoint may also disclose, at our sole discretion, your personal or site visit information as required by law, or to comply with a legally binding request like a subpoena, warrant, or similar legally enforceable requests for information.

WHERE DOES LEVERAGEPOINT HOLD THE INFORMATION IT COLLECTS?

Our Tool and website are hosted in the United States. If you are a resident of a country other than the United States of America, by using our website and/or Tool and by providing us your personal information, you explicitly acknowledge and agree to the transfer of your personal information to the United States.

HOW LONG DOES LEVERAGEPOINT HOLD MY PERSONAL INFORMATION?

For the website, we retain personal information we collect from you when we have an ongoing legitimate business need to do so. When we have no ongoing legitimate business need to process your personal information, we may delete or anonymize it or, if this is not possible (for

example, because your personal information has been stored in backup archives), then we can securely store your personal information until deletion is possible or requested.

For the Tool, we retain personal information that you provide us as long as we consider it potentially useful in contacting you about the Tool, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements, and then we securely delete the information in accordance with the customer subscription agreement.

If you have questions about, or need further information concerning the retention of your personal information, please contact us at Privacy@LeveragePoint.com.

DOES LEVERAGEPOINT USE COOKIES OR BEACONS?

“Cookies” are electronic files many websites place on a visitor’s computer to store information that makes each visit to a respective site more efficient. We use both “session” and “persistent” cookies on our Tool and website. A session cookie stores information about you only while you are visiting our Tool or website, and is then deleted when you leave our Tool or website. Persistent cookies store information about you, your preferences, and information about other websites you visit, and it remains on your computer or device after you leave our Tool or website. To remove cookies, you may configure your browser to clear all cookies, or configure it to reject cookies whenever you visit a new website. Please consult your browser’s user guide for specific instructions on removing cookies. If you choose to decline cookies, you might not be able to fully experience the interactive features of our website. Please note: You will not be able to use our Tool if you decline cookies, because you cannot login to our Tool without cookies.

“Beacons” are small graphic files with a unique identifier that are used to track a web or mobile site user’s online movements. Unlike cookies, beacons are embedded on websites, not downloaded on your computer or device. LeveragePoint uses beacons to better manage content on our website and to improve the use and efficiency of our Tool.

As we discussed above, LeveragePoint works with our Analytics Partners to improve the quality of our website, and to give you access to more relevant information. Our Analytics Partners may use session and persistent cookies, tracking beacons or other monitoring technologies. You can learn more about cookies and our Analytics Partners visiting our website at <https://www.leveragepoint.com/about-us/security/cookie-policy/>.

DOES LEVERAGEPOINT TRACK MY ACTIVITY ACROSS OTHER WEBSITES?

When you visit our website, we automatically collect the name of the website you visited from (called the “referring page”) and the name of the website you chose to visit immediately after ours (called the “exit page”), and information about other websites you have recently visited. This information is used to improve our website, but we cannot specifically identify you from any information we receive from cookies (see above Does LeveragePoint Use Cookies or Beacons?). We do not follow the “Do Not Track” settings available on most browsers. When our website detects the Do Not Track signal from your browser, it will still collect referring and exit page information and other information when you visit our website.

CAN I CHOOSE TO STOP RECEIVING MARKETING MESSAGES FROM LEVERAGEPOINT?

We may send you newsletters and other messages, including marketing emails, about exciting developments with our business, and to alert you to webinars, blogs, and whitepapers. You can always choose to stop receiving communications from us by clicking the “Unsubscribe” or “Update Subscription Preferences” link at the bottom of a LeveragePoint marketing email.

CAN I CHOOSE TO HAVE YOU DELETE MY PERSONAL INFORMATION?

We retain personal information that you provide us as long as we consider it potentially useful in contacting you about the Tool, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements, and then we securely delete the information in accordance with the customer subscription agreement. LeveragePoint will delete your personal information from the servers at an earlier date if you so request by contacting us at Privacy@LeveragePoint.com. Please be aware that if you ask us to delete your personal information, you might not have access to our Tool.

CAN CHILDREN USE LEVERAGEPOINT’S TOOL, WEBSITE, OR PROGRAM?

Our Tool and our website are not directed at children under 16, and we do not knowingly collect personal or other information from children under 16. Simply put, we do not want children users under the age of 16 to use our website, to create a user account for our Tool, or to perform any other type of activity related to our Tool or website. If you are the parent of a child under the age of 16, and you believe he or she has shared information with LeveragePoint, please contact us at Privacy@LeveragePoint.com so we can remove their information from our systems.

WHAT IF I LIVE OUTSIDE THE UNITED STATES?

LeveragePoint is a global company, based in the United States, and our Tool and website are hosted in the United States. Due to the nature of the Internet if you are visiting our website or our Tool, we may transfer the information we collect to countries other than in which the information was originally collected. If you are visiting our website from another country, the laws governing our website's and the Tool's collection and use of personal information may be different from the laws of your country. To safeguard the transfer of data, we participate in the EU-US Privacy Shield and Swiss-US Privacy Shield frameworks and also have Standard Contractual Clauses with certain customers. Please see our Privacy Shield Statement on our website at <https://www.leveragepoint.com/about-us/security/privacy-shield-statement/>.

In compliance with the Privacy Shield Principles (the "Principles"), LeveragePoint commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact LeveragePoint at Privacy@LeveragePoint.com. We will respond to any such complaints within 45 days.

In the event that we fail to respond, or our response is insufficient or does not address the concern, LeveragePoint has registered with JAMS, an alternative dispute resolution provider based in the United States to provide independent third party dispute resolution at no cost to the complaining party. To contact JAMS and/or learn more about their dispute resolution services, including instructions for submitting a complaint, please visit: <https://www.jamsadr.com/eu-us-privacy-shield>. In the absence of a resolution by LeveragePoint and JAMS and under certain and limited conditions, you may have the possibility to engage in binding arbitration through the Privacy Shield Panel.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, we are subject to the investigatory and enforcement powers of the United States Federal Trade Commission (FTC).

Except as permitted or required by applicable law, in the event we transfer personal information provided by our Customers to a third party that is not subject to European Union or Swiss data protection laws, or an adequacy finding, LeveragePoint either (i) requires such third party to subscribe to the relevant Principles or (ii) contractually requires such third party to provide at least the same level of privacy protection as is required by the relevant Principles. In the event that we share personal information with a third party, we remain liable under the Principles if our agent processes personal information in a manner inconsistent with the Principles.

If you are located in the European Union, and have any questions about our processing of personal data, you may contact our EU or UK representatives at leveragepoint@gdprrepresentative.eu or leveragepoint@privacyrep.co.uk.

WHAT IF I LIVE IN CALIFORNIA?

Although LeveragePoint currently is not required to be compliant under the California Consumer Privacy Act (the “CCPA”), your privacy is of utmost importance to us. If you have any questions about your rights under the CCPA, please contact us at Privacy@LeveragePoint.com.

We do not sell your personal information, as defined under California law. We do not share personal information with third parties for their direct marketing purposes. We do not discriminate against any individual for exercising your data protection rights. If you are a California resident, you have the following data privacy and protection rights under the CCPA:

- You can request that we disclose to you certain personal information that we collect from you
- You have the right to request the deletion of certain personal information we collect from you
- You can obtain from us once a year, free of charge, certain information about the personal information we disclosed to third parties for direct marketing purposes in the preceding calendar year
- You have the right to opt-out of the sale of your personal information
- You have certain rights not to be discriminated against based on exercising your data protection rights.

If you are a California resident and would like to make any of these requests, please contact us at Privacy@LeveragePoint.com. We will respond to verified consumer requests within 45 days.

WHAT IF I FOLLOW A LINK TO A THIRD-PARTY WEBSITE?

LeveragePoint’s Tool and website may contain links to third-party websites. Those websites are governed by their own privacy and data use practices and policies. We do not have control over the privacy practices of the advertisers or other third-parties operating these websites, and we have no control over how these third-parties collect or use the information you chose to share with them if you click on third-party links.

HOW DOES LEVERAGEPOINT PROTECT MY INFORMATION?

We take the security of your personal information very seriously. We use reasonable administrative, physical, and technical safeguards to secure the personal information you share with us. As part of our security practices, LeveragePoint undergoes an annual SOC 2 Type II audit for certification by a third-party audit firm under standards set by the Association of International Certified Professional Accountants (AICPA). Despite our safeguards and our additional efforts to secure your information, LeveragePoint cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third-parties will not be able to defeat our security, and improperly collect, access, steal, or modify your personal information.

WILL LEVERAGEPOINT CHANGE THIS PRIVACY POLICY?

LeveragePoint may update our privacy policy to reflect changes to our Tool, our website and our information practices. If we make any material changes, we will notify you by posting a notice on our website with a link to our revised policy. If you are a user of our Tool, then you will receive notice at Tool log-in and potentially by email as well. We encourage you to periodically review this privacy policy.

HOW DO I CONTACT LEVERAGEPOINT?

For questions about this privacy policy or about LeveragePoint's privacy and information security practices generally, you can contact LeveragePoint at Privacy@LeveragePoint.com or at LeveragePoint's address: c/o Privacy Officer, 10 Cabot Road, Suite 205, Medford, MA 02155.

If you are located in the European Union, and have any questions about our processing of personal data, you may contact our EU or UK representatives at leveragepoint@gdprrepresentative.eu or leveragepoint@privacyrep.co.uk.