

FYRA, LLC PRIVACY POLICY

FYRA, LLC, 1100 East Hector Street, Suite 323, Conshohocken, PA, 19428, USA (“**Fyra LLC**”, “**we**”, “**us**” or “**our**”) respects your privacy and is committed to protecting it through our compliance with this privacy Policy (the “**Policy**”). FYRA LLC, with its affiliates and its subsidiaries, owns, operates, or provides access to, several interactive websites, mobile and connected applications, and other online interactive features and services, including, but not limited to, emails, newsletters, chat areas, forums, communities, sweepstakes, online registrations and contests (collectively the “**Site**”).

This Privacy Policy covers information collected through the following websites and mobile applications

- Fyra.io

This Policy describes the types of information we may collect from you or that you may provide when you visit this website (the “**Site**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect: (i) on the Site and (ii) in email and other electronic messages between you and the Site.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. This Policy expressly incorporates by reference and includes the Site’s Terms & Conditions and any guidelines, rules or disclaimers that may be posted and updated on specific webpages or on notices that are sent to you. If you do not agree with our policies and practices, you must not access or use the Site. By accessing or using the Site, you agree to this Policy.

CONTROLLER

If you are an EU national and reside in the EU, or are non-EU national residing in the EU, the data controller (as defined under EU data protection law) will be FYRA LLC.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

CONTACT DETAILS

To ask questions or comment about this Policy and our privacy practices, contact us at:

FYRA LLC

Edward Sides

dpo@fyra.io

1008 Upper Gulph Rd, Wayne, PA 19087

484-581-1800

CHILDREN UNDER THE AGE OF 13

The Site is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Site. We do not knowingly collect personal data from children under 13. If you are under 13, do not use or provide any information on the Site, register for the Site, use any of the interactive or public comment features of the Site or provide any information about yourself to us, including your name, address, telephone number, email address or any screen name or user name you may use. If we learn we have collected or received personal data from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please **Contact Us** at privacy@fyra.io

THIRD PARTY LINKS

This website may include links to other sites operated by third parties. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

DATA WE COLLECT ABOUT YOU

We collect several types of information from and about users of the Site, including information:

- by which you may be personally identified, such as name, postal address, email address, telephone number (“**personal data**”);
- that is about you but individually does not identify you (“**anonymous data**”); and/or
- about your internet connection, the equipment you use to access the Site and usage details.

HOW WE COLLECT YOUR PERSONAL DATA

We collect this information:

Directly from you when you provide it to us.

You may give us your personal data by filling in forms, or by corresponding with us by post, email or otherwise. This includes personal data you provide when you:

- post or publish material (such as contributions) on the Site (“**User Contributions**”);
- request information or services;
- report a problem with the Site;
- respond to a survey;
- enter into a transaction with us; or
- search queries on the Site.

Automatically as you navigate through the Site.

Information collected automatically may include usage details, IP addresses and information collected through:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of the Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Site.
- **Flash Cookies.** Certain features of the Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on the Site. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices about How We Use and Disclose Your Information.
- **Web Beacons.** Pages of our the Site and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

The information we collect automatically includes personal data, and we may maintain it or associate it with personal data we collect in other ways or receive from third parties. It helps us to improve the Site and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize the Site according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the Site.

From third parties, for example, our business partners.

We may receive personal data about you from various third parties and public sources to collect information about your online activities over time (i.e. behavioral tracking) as set out below:

- IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website from the following parties:
 - (a) analytics providers;
 - (b) search information provider;
 - (c) social media providers;
 - (d) email service providers;
 - (e) advertising providers;
 - (f) registration providers; and
 - (g) application providers
- Contact details, bank account details and details about payments to and from you and other details of products and services you have purchased from us from providers of technical, payment and delivery services.

THIRD-PARTY USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES

Some content or applications, including advertisements, on the Site are served by third-parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies (alone or in conjunction with web beacons or other tracking technologies) to collect information about you when you use the Site. The information they collect may be associated with your personal data or they may collect information, including personal data, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

WHAT CATEGORIES OF INFORMATION WE MAY PROCESS

We may process: your personal data (e.g., your name); demographic data (e.g., date of birth); your contact details (e.g., your address); records of your consents, information about your interactions with our content or advertising; and any view or opinions you provide to us.

We may also Process information about you from your use of the Site (e.g., device, internet service provider, IP address, etc.)

“Process”, “Processing” or “Processed” means anything that is done with any personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We may Process the following categories of personal data about you:

- Personal details: your name; username; password; NPI; OE number, license number; areas or topics of interest; bio; and photograph (if you or another user posts a photo on the Site).
- Demographic information: age/date of birth; nationality; prefix; suffix; occupation, company information, education, graduation year; work experience and other professional information.
- Contact details: postal address; telephone and/or mobile number; email address; website; and your public social media handles or profile(s).
- Consent records: records of any consents you may have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).
- Location information: location data that describes the precise geographic location of your device.
- Views and opinions: any views and opinions that you or other users choose to send to us, or publicly post about us on social media platforms or in the Site, including on forums.
- Event information: meeting, course, webinar, or online event; questions; ratings; and applications used.

HOW WE USE YOUR INFORMATION

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that the legal bases in the table below are required to be specified under EU data protection law, but are not required, or required to be specified, if you are not an EU citizen/do not reside in the EU.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To provide you with the general use of our website	Legitimate interests: <ul style="list-style-type: none">• Getting to know users or potential users / colleagues / recruiters / employees / workers / consultants / service providers• Managing business communications with our users• Maintaining and managing our website• Responding to your communication(s) with us

<p>To provide you with information, products or services that you request from us.</p>	<p>Legitimate interests:</p> <ul style="list-style-type: none"> • Identification of relevant content shared with users and prospective users • Responding to your communication(s) with us <p>Necessary for performance of a contract:</p> <ul style="list-style-type: none"> • If you wish to purchase products or services from us, we will be required to fulfil our obligations under any contracts we enter into with you
<p>To provide you with notices about your account including expiration and renewal notices</p>	<p>Legitimate interests:</p> <ul style="list-style-type: none"> • Keeping users informed about their account • Maintaining and managing our website
<p>To carry out our obligations and enforce our rights arising from any contracts entered into between you and use, including for billing and collection</p>	<p>Necessary for the performance of a contract:</p> <ul style="list-style-type: none"> • If you wish to purchase products or services from us, we will be required to fulfil our obligations under any contracts we enter into with you
<p>To notify you about changes to the Site or any services we offer or provide through it</p>	<p>Legitimate interests:</p> <ul style="list-style-type: none"> • Keeping users informed about our website and services provided through it • Maintaining and managing our website
<p>To allow you to participate in interactive features on our</p>	<p>Legitimate interests:</p>

<p>site such as posting User Contributions</p>	<ul style="list-style-type: none"> • Maintaining and managing our website • Allowing user to make contributions to our website in their professional capacity in order to publicise or highlight certain aspects of their work
<p>To send you marketing or promotional materials</p>	<p>Legitimate interests:</p> <ul style="list-style-type: none"> • Getting to know users or potential users / colleagues / recruiters / employees / workers / consultants / service providers • Identification of relevant content shared with users and prospective users • Understanding how you want us to communicate with you • Expanding our professional networks <p>Consent:</p> <ul style="list-style-type: none"> • On the basis of the consent that you have provided us to receive certain communications
<p>To administer and protect our business and this website</p>	<p>Legitimate interests:</p> <ul style="list-style-type: none"> • Provision of administration and IT services • Performance documents and quarterly reports • Network security • To prevent fraud

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please **Contact Us** at privacy@fyra.io

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURE OF YOUR INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal data that we collect or you provide as described in this Policy:

Our subsidiaries and affiliates

We may disclose your personal data to our other group entities including our offices based in the United States in order to provide you with tailored services and communications, or in accordance with our business administrative practices. If an entity is located outside of the European Economic Area (EEA) and if you are an EU national and reside in the EU, or are non-EU national residing in the EU

Service providers

- **Cloud services** - we may disclose your personal data to cloud service provider(s) located in the United States in order to store, back up and recover data.
- **IT services** - we may disclose your personal data to IT service providers located in the United States to provide us with services such as website hosting.
- **Customer Relationship Management services**- we may disclose your personal data to customer relationship management services located in the United States to store information, manage service activities and information across the group.
- **Email Service Providers** – we may disclose your personal data to email service providers located in the United States to provide us with email marketing services, online behavioural tracking, to store information, and reporting.
- **Registration Services** – we may disclose your personal data to registration service providers located in the United States to provide us with services such as data collection, and payment processing.
- **Geo-Location Services** - we may disclose your personal data to geo-location service providers located in the United States to provide us with services such as geo-targeting site content.

- **Payment Processing Services** - we may disclose your personal data to payment service providers located in the United States to provide us with services such as secure payment processing, and to store information.
- **Market Research Services** - we may disclose your personal data to market research service providers located in the United States to provide us with services such as surveys/questionnaires.
- **Application Provider Services** - we may disclose your personal data to application service providers located in the United States to provide us with services such as event specific applications, and to store information.

Corporate transactions or events

- We may disclose your personal data to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of FYRA LLC's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal data held by us about the Site's users is among the assets transferred.

Other Third Parties

- **Contractors** - we may disclose your personal information to contractors located in the United States to provide us with product and/or advertising implementations.
- **Third party** - we may disclose your personal information to contractors located in the United States to market their products or services to you if you have knowingly opted in to these disclosures.
- **Other users of the Site** - Any User Contributions that you post and transmit to others shall be done your own risk. Although we limit access to certain contributions to registered users of the site, please be aware that no security measures are perfect or impenetrable. We cannot control the actions of other users of the Site with whom you may choose to share your User Contributions.

Legal Reasons

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply the Site's Terms and Conditions and other agreement between us and you, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of FYRA LLC, our users or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal data you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe’s website. If you disable or refuse cookies, please note that some parts of the Site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** We do not share personal data with unaffiliated or non-agent third parties other than as set out in this Policy. Some content may require you to provide personal data to a third-party in order to gain access, however you will be notified of this requirement at which time you may accept or deny these terms. We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose to not have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“NAI”) on the NAI’s website.

INTERNATIONAL TRANSFERS

Some of our group entities and service providers are located in the United States and Europe. Accordingly, if you are an EU national and reside in the EU, or are non-EU national residing in the EU, please note that processing of your data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring that where we use certain service providers based outside the EEA, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Such a transfer may also be necessary in order to perform a contract with you/fulfil your request and/or through obtaining your explicit consent.

Please **Contact Us** at Privacy@fyra.io if you want further information on this specific mechanism used by us when transferring your personal data out of the EEA.

DATA RETENTION AND SECURITY

We retain your personal data only for as long as is necessary for our relationship with you, in accordance with our retention policies, and in accordance with applicable laws. We do not collect more personal data than we need to fulfil our purposes stated in this Policy, and we will not retain it for longer than is necessary.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents and service providers who need to

know that information in order to provide services to us and yourself. We maintain physical, electronic and procedural safeguards to protect your personal data.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

YOUR LEGAL RIGHTS

If you are an EU national and reside in the EU, or are non-EU national residing in the EU then under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- **Request access to your personal data** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of your personal data.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data.** Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer of your personal data.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
- **Right to withdraw consent.** If we rely on this as the legal basis of lawful processing, you may withdraw at any time.
- **Right to lodge a complaint with the supervisor authority.** You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. Alternatively, if you are based in the EEA and outside of the UK, please contact your national regulator.

If you wish to exercise any of the rights set out above, please **Contact Us** at Privacy@fyra.io

YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits users of the Site that are California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@fyra.io .

CHANGES TO OUR POLICY

We will post any changes we make to this Policy to this page along with a notice at the end of the Policy of the last date that any changes were made. If we make material changes to how we treat our users' personal data, we will notify you by email to the email address specified in your account and/or through a notice on the Site's homepage.

You are responsible for ensuring we have an up-to-date, active, and deliverable e-mail address for you, and for periodically visiting this Policy to check for any changes.

Last revised: 5.24.18
