

TRIB3.com, Inc.
928 Greenwich St.
San Francisco, CA 94133

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TRIB3.com Privacy Policy

TRIB3.com, Inc. (“TRIB3,” “we,” “us”) provides this Privacy Policy to inform users of our policies and procedures regarding the collection, use and disclosure of personally identifiable information received and collected from (i) users of the websites located at trib3.com and tribedynamics.com (“Site”) (ii) users of our online social marketing management software, including, but not limited to, Tribe Ambassador Relationship Management (ARM), available on the Site (collectively, “Subscription Services”), (iii) social media sites not owned by us. Please note that this Privacy Policy applies to the information that we collect through (i) this Site(ii) Subscription Services, and (iii) social media site APIs. This Privacy Policy may be updated from time to time for any reason. We will notify you of any material changes to our Privacy Policy by posting the new Privacy Policy on the Site. You are advised to consult this Privacy Policy regularly for any changes.

By using our Site and the Subscription Services, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. “Processing” means using cookies or Tags (defined below) on a computer or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information, all of which activities will take place in the United States. If you reside outside the U.S. your personally identifiable information will be transferred to the U.S., and processed and stored there under U.S. privacy standards. By visiting our Site or otherwise providing information to us, you consent to such transfer to, and processing in, the U.S. If you have any questions or comments about this Privacy Policy or our use of your personally identifiable information, please contact us at info@trib3.com.

INFORMATION COLLECTION AND USE

Our primary goals in collecting personally identifiable information are to provide you with the products and services made available through the Site, including, but not limited, to the Subscription Services, to communicate with you, and to manage your registered user account, if you have one. When collecting information from social media sites not owned by us, our goal is to help connect those users of other social media sites (“Influencers”) with brands for the purposes of Influencer career growth.

If you desire to have access to certain restricted sections of the Site, you may be required to become a registered user, and to submit certain personally identifiable information to TRIB3. This may happen in a number of instances, such as when you sign up for a free trial of the Subscription Services or you download materials such as “white papers” from the Site, if you desire to receive our newsletter or other marketing materials and information, or if you wish to enter into a contests, sweepstakes or promotions (collectively, “Promotions”) we provide via the Site. Personally identifiable information that we may collect in such instances may include your user name, password, company title (if applicable), email address, physical address and telephone number. If you decide to become a paying customer for the Subscription Services, we may collect additional information from you, such as your credit card number or other billing information. If you contact us by email through the Site, we may keep a record of your contact information and correspondence, and may use your email address, and any information

that you provide to us in your message, including any information you may provide about your search spending, to respond to you. In addition, we may use your contact information to market to you, and provide you with information about, our products and services, including but not limited to our Subscription Services. If you decide at any time that you no longer wish to receive such information or communications from us, please follow the unsubscribe instructions provided in any of the communications or contact us at info@trib3.com.

When you visit the Site, our servers automatically record information that your browser sends whenever you visit a web site (“Log Data”). This Log Data may include information such as your internet protocol (“IP”) address, browser type or the domain from which you are visiting. For most users accessing the Internet from an Internet service provider the IP address will be different every time you log on. Except in the instances described herein, we do not use this information to identify you personally. We use it to monitor the use of the Site and of any services or Promotions we provide via the Site including our Subscription Services, and for the Site’s technical administration. But the same pieces of information are considered non-identifying information when they are taken alone or combined only with other non-identifying information (for example, your viewing preferences). For users of the Subscription Services only, we may combine your personally identifiable information with non-identifying information and aggregate it with information collected from Site users to attempt to provide you with a better experience, to improve the quality and value of the services and Promotions we provide via the Site and to analyze and understand how our Site, services and Promotions are used.

We collect publicly available social media data from social media site APIs. This may include information such as the influencer’s name, email address, photos, location, social media posts, friends, and followers. We use the legitimate interests lawful basis to process personal data from influencers. This lawful basis allows use of people’s data in ways they would reasonably expect and which have a minimal privacy impact. We only collect publicly available information. When influencers publish social media posts publicly, it is a clear indication that they want to be discovered by brands and followers. We process their data in order to facilitate building relationships between brands and influencers. Core to our mission is helping brands build influencer communities in a scalable, genuine way. This benefits influencers by growing their careers via developing genuine relationships with our brand clients. We process influencers’ social media data at scale so that brands can identify the best influencers to work with using machine learning and automated decision making (e.g. profiling).

COOKIES

Like many web sites, we also use “cookie” technology to collect additional website usage data and to improve the Site and any services or Promotions we provide via the Site including our Subscription Services. A cookie is a small data file that we transfer to your computer’s hard disk. We do not use cookies to collect personally identifiable information. TRIB3 may use both session cookies and persistent cookies to better understand how you interact with the Site and with and any services or Promotions we provide via the Site including our Subscription Services, to monitor aggregate usage by our users and web traffic routing on the Site, and to improve usability and performance of the Site. A session cookie enables certain features of the Site and our service and is deleted from your computer when you disconnect from or leave the Site. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Site. Persistent cookies can be removed by following your web browser help file directions. Most Internet browsers automatically accept cookies. You can instruct your browser, by editing its options, to stop accepting cookies or to prompt

you before accepting a cookie from the web sites you visit. If you do not accept cookies, however, you may not be able to use all portions of the Site.

TAGS

We also use “web beacons,” “pixel tags,” “clear GIFs” or similar means (individually or collectively “Tags”) on our Site and the Subscription Service. A Tag is an electronic image, often a single pixel, embedded on web pages. Tags are ordinarily not visible to users. Tags allow us to count the number of users who have visited certain pages of the Site or the Subscription Service, and to generate statistics about how our Site and Subscription Service are used.

We use the services of third party companies to help us carry out and measure the effectiveness of our own advertising campaigns. For example, these third party companies may ensure that you are shown ads at appropriate frequencies, so that you do not see the same ad repeatedly. As part of these services, one or more Tags may be placed on the Site. These Tags do not enable third parties to collect your name, e-mail address, phone number or other similar information that directly identifies you. Rather, when you visit the Site, these Tags will direct your web browser to contact these third party companies, at which time they may set or read a cookie on your device and collect information about your visit – such as your IP address, cookie ID, which parts of the websites are viewed or clicked, and date/time information.

We use information collected from Tags to gather non-personally identifiable information, including, but not limited to, your computer’s IP address, browser type or the webpage you were visiting before you came to our Site or the Subscription Service, pages of our Site or the Subscription Service that you visit, the time spent on those pages, information you search for on our Site or in the Subscription Service, access times and dates, and other statistics.

INFORMATION SHARING AND DISCLOSURE

General. Except as set forth in this Privacy Policy, TRIB3 will not share your personally identifiable information with third parties. If you decide to enter into one of our Promotions, we may share your personally identifiable information with third parties who work with us to sponsor and promote such Promotions.

Aggregate Information and Non-Identifying Information. We may share aggregated information that does not include Personal Information and we may otherwise disclose Non-Identifying Information and Log Data with third parties for industry analysis, demographic profiling and other purposes. Any aggregated information shared in these contexts will not contain your Personal Information.

Service Providers. We may engage certain trusted third parties to perform functions and provide services to us, including, without limitation, hosting and maintenance, customer relationship, database storage and management, and direct marketing campaigns. We will share your personally identifiable information with these third parties, but only to the extent necessary to perform these functions and provide such services, and only pursuant to binding contractual obligations requiring such third parties to maintain the privacy and security of your data.

Compliance with Laws and Law Enforcement. TRIB3 cooperates with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims, legal process (including subpoenas), to protect the property and rights of TRIB3 or a third party, the safety of the public or any person, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law.

Business Transfers. If any or all of the assets of TRIB3 are acquired by, or merged with another entity, we may share some or all of your information with this entity.

CHANGING OR DELETING INFORMATION

If you are a registered user of the Site, you may update or correct the information you provided to us by requesting us to make such changes at privacy@tribedynamics.com.

If you are an influencer, you may request to access, correct, or delete the information we have collected about you from social media websites by requesting us to make such changes at privacy@tribedynamics.com.

SECURITY

TRIB3 is very concerned about safeguarding the confidentiality of your personally identifiable information. We employ advanced administrative, physical and electronic measures designed to protect your information from unauthorized access.

We will disclose any breach of the security, confidentiality, or integrity of your unencrypted electronically stored personal data to you via email or conspicuous posting on this Site in the most expedient time possible and without unreasonable delay, consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

INTERNATIONAL TRANSFER

Your information may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide information to us, Entity transfers Personal Information to the United States and processes it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We process data in US-based servers. This processing is supported by compliance for safeguarding any transfers of personal data outside of the EU. The same high standards for safeguarding personal information is upheld by both Trib3, Inc. (our U.S. entity) and Tribe Dynamics International, Ltd. (our E.U. entity).

LINKS TO OTHER WEBSITES

Our Site and Subscription Service contain many links to other websites. The fact that we link to a web site does not constitute an endorsement, authorization or representation of our affiliation with that third party. We do not exercise control over third party websites. These other web sites will most likely place their own cookies or other files on your computer, collect data or solicit personal information from you. This Privacy Policy addresses the use and disclosure of information that we collect from you through the Site. Other sites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

OUR POLICY TOWARDS CHILDREN

The Site and Subscription Service is not directed to persons under 18. If a parent or guardian becomes aware that his or her child has provided us with personally identifiable information without their consent, he or she should contact us at info@trib3.com. If we become aware that a child under 13 has provided us with personally identifiable information, we will remove such information from our files immediately.

CONTACT

Contact us by emailing privacy@trib3.com. Our Data Protection Officer is Jon Namnath, who is available at jon@tribedynamics.com.