



Privacy Policy

Last Updated: September 10, 2018

Babel Street® understands the importance of privacy and values the trust that our customers, our partners and our website visitors place in us. Therefore, Babel Street, Inc. ("**Babel Street**") wants you to be familiar with how we handle information relating to you as an individual, known as personal information.

This Privacy Policy describes our practices for the information we collect, use and disclose. This information is gathered through the means listed below, which we collectively refer to as our "Services":

- our website <https://www.babelstreet.com>;
- our search and analytics products described at <https://www.babelstreet.com/#products> which we refer to as our "Products";
- our LinkedIn page located at <https://www.linkedin.com/company/babel-street>; and
- corporate events, such as technology conferences, networking events, tradeshows or trainings.

About Our Products

The mission of our company is to help our customers locate relevant and timely publicly and commercially available information without the limits of language or origin. Our customers direct their informational queries using the Babel Street Software as a Service (SaaS) platform and decide what information they need and from which sources.

Types of Information We Collect

Babel Street collects information about you, as a visitor to our website and/or corporate events, user of digital content, customer, supplier, or partner in connection with our Products or Services, or when you otherwise interact with us.

This can include:

- **Information voluntarily provided to us by website visitors, customers, suppliers, partners, event participants and other individuals, such as:**
 - contact details, including name, address, company name, email and telephone number,
 - account information, if applicable,



- comments on our LinkedIn postings, and
- financial and transaction data, including purchase history, payment and billing information.
- **Information required to operate our Services, such as:**
 - information necessary to secure your account, including your user name,
 - other information relating to your interactions with our Services, including requests for support, feedback, payment and the execution of the purchase of our Products, and
 - information from publicly and commercially available sources, and other information which customers choose to search for using our Products, including identification and background information, interactions through online platforms, interests, professional and personal data, posts and user sentiment.
- **Usage and navigational information:**
 - clickstream information, such as which search engines our visitors use,
 - interactions with digital and other content,
 - IP address, and
 - browser type.

To the extent information that we collect, receive or use is information which relates to an identified or identifiable individual in the European Economic Area (“**EEA**”), we will treat such information as personal information as required by applicable law.

If you disclose to us or search for any information relating to other people in connection with your use of the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

When you become a Babel Street customer and access our Products, your use of the Products is subject to Babel Street’s subscription terms and conditions. If you do not want to share the necessary information to process a business transaction with us or if you do not accept the applicable terms, you will not be allowed to access our Products.

The Ways We Collect Information

We collect personal information in the following ways:

- **Through our Services:** We collect information through our Services, for example, when you use a Babel Street product, register an account with us, visit our website or offices, attend a technology event, or contact our customer support team.



- **From other sources:** We receive your information from other sources, at the instruction of our customers, such as:
 - publicly and commercially available data sources, including news outlets, blogs, message boards, consumer sites, social media pages and platforms, and traditional web or deep web searches and
 - customers and other individuals, such as referrals or other contacts.

How We Use Information

We use personal information for legitimate business purposes including:

- **Providing or facilitating the use of our Products:**

- arranging access to our Products
- creating and administering accounts
- fulfilling and recording transactions

We engage in these activities to manage our contractual relationship with you, with your consent, where we have a legal obligation or authorization (such as a public interest) to do so, and/or where we have a legitimate interest.

- **Product improvement:**

- to better understand you and your Product transactions and uses so that we can fine tune our offerings
- to maintain, develop, market and/or improve our Products and Services

We engage in these activities where we have a legitimate interest to do so.

- **Product and customer support:**

- to resolve customer issues or answer customer questions
- to inform and communicate with customers about improvements or updates to our Services and terms
- to provide general customer support

We engage in these activities to manage our contractual relationship with you or where we have a legitimate interest to do so.

- **To deliver marketing content and enable social sharing:**

- to deliver marketing emails and content with information about our Products and our company
- to facilitate a social sharing functionality that you choose to use

If you are not a current customer, but you have reached out to us in the past, or we have received your personal information through a technology event or other



avenue, we may use your information to inform you about our services or future events we will be hosting or attending. If you are located in the EU, we will obtain your consent before sending these types of communications.

If you do not wish to receive such material, or have specific contact preferences, please contact us at info@babelstreet.com. Please note that if you opt-out of receiving marketing-related emails and other messages from us, we may still send you important administrative messages, from which you cannot opt-out.

We engage in these activities with your consent or where we have a legitimate interest to do.

- **Participation in our corporate events:**

Where you choose to attend our corporate events, such as technology conferences, networking events, tradeshow or trainings.

We engage in these activities to manage our contractual relationship with you or where we have a legitimate interest.

- **Aggregating and/or anonymizing:**

We may aggregate and/or anonymize information so that it will no longer relate to an identified or identifiable individual. We do so to generate other data for our use, which we may use and disclose for any purpose.

We engage in these activities where we have a legitimate interest.

- **Accomplishing our business purposes:**

- for accounting, bookkeeping and audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements
- for website administration, analytics and security
- to improve the safety and reliability of our Services
- for fraud and security monitoring purposes, and to address technical issues, for example, to detect and prevent cyberattacks
- to prepare or execute a business transaction, such as an investment, reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings) ("**Business Transaction**")
- to protect our rights and to defend against lawsuits
- to meet our legal duties, such as requests from public and government authorities



We engage in these activities where we have a legal obligation or authorization and/or legitimate interest to do so.

Disclosure of Information

We disclose information in the following ways:

- **To our third-party service providers, to facilitate services they provide to us:** These can include providers of services such as data hosting, payment processing, information technology and related infrastructure provision, email delivery, auditing, and other services.
- **To a dedicated organization administrator:** If you are a customer of Babel Street and your organization has dedicated an Administrator of the Babel Street account, that individual may have access to some of your information, such as your username and the details of your use of our Services.
- **To comply with applicable laws and regulations or to cooperate with government authorities, including law enforcement:** To respond to a legal or administrative request or order, or to provide information we believe is important. This can include authorities outside your country of residence.
- **For other legal reasons:** To enforce our terms and conditions or to protect our rights, privacy, safety or property, and/or that of our affiliates, employees, you or others.
- **In connection with a Business Transaction:** We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of a Business Transaction. Such third parties may include, for example, investors in Babel Street or an acquiring organization and its advisors.

Security

No method of transferring data over the internet is ever 100% secure. However, we employ a variety of appropriate technical and organizational security measures designed to ensure the security of our Products.

Your Rights

If you would like to request to review, correct, restrict or delete personal information that you have previously provided to us, object to the processing of personal information, or if you would like to request to receive an electronic copy of your personal information, you may contact us by sending an email to info@babelstreet.com. We will respond to your request consistent with applicable law.



In your request, please make clear to what personal information your request relates. For your protection, we may only implement requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete transactions initiated prior to the request.

Additional information for the EEA: you may lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities is available at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

Retention

We retain personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we are providing our Services to a customer, or as the customer instructs.
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of transactions for specific time periods before we can delete them).
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Cookies

Like most websites today, we use cookies on our website. Cookies are small files that a web server transfers to an individual's computer for functionality and recordkeeping purposes while visiting that site. We use cookies to improve your user experience and the overall quality of our services, and to facilitate your ongoing access to and use of our site, among other things. Cookies may also convey information to us about how frequently you access the Services and allow us to evaluate usage of the Services over time. You can view and manage cookies in your browser, including blocking and deleting cookies, though browsers for mobile devices might not offer this visibility.

Babel Street has a legitimate interest in understanding how customer and potential customers use our website. This information assists us with providing more relevant products and services, communicating value to our customers and providing appropriate staffing and resources to meet our customers' needs.

We use several types of cookies in our Services:

- Analytics cookies, which collect information about the usage of our website and related statistics on how users interact with our site.



- Performance cookies, which help us understand and improve how the Services perform. Specifically, these cookies allow us to gather data on technical errors, collect information so we can analyze load balancing on our site, confirm that users can stay logged in to our Products and continually ensure that our Services remain up and running for our customers and partners.
- Security cookies, which process information to help us secure our Products, as well as detect fraud and abuse.

Do Not Track Signals

We currently do not honor Do Not Track browser signals.

Links to Other Web Sites

This site may contain links, references or make calls to other websites. Please be aware that we are not responsible for the privacy practices of those websites and this Privacy Policy does not apply to those sites. We encourage you to read the privacy policy of any website you visit if you have questions.

Sensitive Information

Unless we request it, we ask that you not send us, and you not disclose, any sensitive information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the website.

Cross-border Transfers

Your personal information may be stored and processed in any country where we have facilities or in which we engage service providers, and, by using and interacting with the Services, you understand that your personal information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we design our Services and terms so that adequate measures are in place, such as standard contractual clauses adopted by the European Commission to protect your personal information. You may obtain a copy of these measures by following this [link](#) or by contacting us as set out in the 'Contact Us' section below.



California Privacy Law

If you are a California resident, California Civil Code section 1798.83 permits you to request information regarding the disclosure of your personal information by a company to a third party, for the third party's direct marketing purposes. As we do not make such disclosures, we are exempt from this requirement.

Children's Privacy

Due to the nature of our business, Babel Street's website and Services are intended for use strictly by adults. We do not knowingly solicit or collect any personal information from children.

Changes to Our Privacy Policy

We reserve the right to update or amend this Privacy Policy from time to time. The "Last Updated" date at the top of this Policy indicates when the Policy was last revised.

Contact Us

If you have any questions about this Privacy Policy or the privacy practices of Babel Street and you are in any location outside of the EEA, please contact us at info@babelstreet.com:

Babel Street, Inc.
1818 Library Street, Suite 500
Reston, VA 20190
(703) 520-9506

If you are located in the EEA, we have appointed our EU affiliate, Babel Street, Limited, to act as an EU representative for Babel Street, Inc. Babel Street, Limited does not serve as a separate controller of personal data. The only role of Babel Street, Limited is that of an EU representative. For those located in the EEA, please contact us at:

Babel Street Limited
4th Floor 7/10 Chandos Street,
Cavendish Square,
London, W1G 9DQ