

Privacy Policy

Updated: May 25, 2018

This website is owned and operated by Babel Street, Inc. We understand the importance of privacy and value the trust that our customers, our partners, and our website visitors place in us to protect their information. This Privacy Policy describes the way we handle and use personal information collected from visitors to our website and from our customers. Personal information is information about you that is personally identifiable, such as your name, mailing address, email address, or phone number.

Effective Date and Acceptance

This updated Privacy Policy is effective as of May 25, 2018. By using this site and/or our products or services, you accept the practices described in this Privacy Policy.

Types of Information We Collect

In general, Babel Street collects information when you interact with us, when you use our products or services, or when you visit our website. This information helps us provide, maintain and continually improve our products, services and our website. Specifically, we may collect the following types of information:

- **Navigational information:** We may collect information automatically received from your computer and browser when you access our site and our products, such as your browser type and IP address. This information allows us to identify visitor trends and preferences, to understand the broad demographics of our customers, and to diagnose and quickly resolve any problems with our site.
- **Information provided through our website or received at technology conferences:** We may receive and store any information that you voluntarily submit to us through our website. We use this information to contact you as a potential customer. We also record and retain most written communications with customers to provide the highest quality customer support. In addition, when we sponsor or participate in a technology conference or event, we may receive a list of the event attendees and their contact information.
- **Information gathered during the purchase and use of our products:** We receive and store information from customers and partners in order to process the business transactions associated with the purchase of our products. We also collect information when customers and registered users log into and use the Babel Street platform. This user information is maintained in security files and is under restricted access limitations.
- **Financial information:** We receive and store financial information provided by customers upon their purchase of Babel Street products, which includes billing name, billing address and payment information.

- **Publicly and commercially available information:** We search across a variety of publicly and commercially available information at the direction of our customers for their use within the Babel Street platform. This information comes from public sources and our partners and may contain some personal data. Our customers use this data for informational and research purposes. For example, customers may be interested in hyper-local current events from a news source in a specific region of the world, or in understanding what opinions consumers are expressing about a new product on social media. Some of the information available through the Babel Street platform is subject to certain data use restrictions.

Our Products and Services

When you become a Babel Street customer and access our platform, your use of the services is subject to the terms of your subscription agreement or end user terms and conditions with Babel Street. If you do not want to share the necessary personal data 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 or services. Additionally, when you sign in to our services, we collect information about your transactions with us, such as the frequency with which you use our services. Babel Street personnel will not view, use, or distribute the content of any such customer information without express permission, except as described below.

How We Use Your Information

We may use the information we collect in the following ways:

- **Providing, maintaining and improving our services:** We use personal information to provide customers with our services, to maintain our services by ensuring they are working as intended and to improve our customers' experiences with our services through technical enhancements. When necessary, we use information to help improve the safety and reliability of our services. This might include actions like detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm our users or Babel Street. In addition, we also use personal information to process customer transactions and measure the data usage of our services.
- **Customer support:** We may also use the information we collect to answer customer questions, resolve any customer issues, inform customers of improvements or updates to our services, and provide general customer support.
- **Managing our business needs:** We use some of the information we collect to handle responsibilities such as site administration, analytics, fraud prevention, enforcement of our corporate reporting obligations and our terms of use.
- **Marketing:** 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 personal information to inform you about our services or future events we will be attending. If you do not wish to receive such material, or have specific contact preferences, please contact us at info@babelstreet.com. If you are a resident of the European

Union, we will ask for your consent before using your personal information to send you marketing materials.

Most importantly, we will ask for your consent before using your information for a purpose that isn't covered by this Privacy Policy.

Disclosure of Your Information to Third Parties

As part of our commitment to privacy, Babel Street does not share, sell, rent, or trade your personal information with third parties for any online behavioral advertising, or any other promotional or commercial purposes.

Under the following limited circumstances, we may reveal your personal information to third parties:

- **Consent:** If you request or authorize us to disclose your information to a third party, we will honor your request, after receiving it in writing.
- **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 personal information such as your username and the details of your use of our services.
- **Partners:** Subject to any confidentiality obligations in the applicable customer agreement or end user terms and conditions, Babel Street may share information with other companies that work on Babel Street's behalf. These partners and service providers are contractually required to maintain the confidentiality of the information we provide to them.
- **Legal Necessity:** We will share your information if required by law, by court order, or by order of any government or administrative tribunal with proper jurisdiction. If allowable under the applicable law, we will notify you prior to disclosure of the information. In addition, we may share your information to enforce an agreement that we have with you, or to defend ourselves in litigation. We may also share information to protect our rights, property or safety, or the rights, property or safety of our employees, or others. If Babel Street is ever involved in a merger, acquisition, or sale of assets under which Babel Street ceases to exist as a separate company, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

Our Security Measures to Protect Your Information

No method of transferring data over the internet is ever 100% secure. However, we employ a variety of appropriate technical and organizational security measures to ensure the proper level of security in our products. We take vigilant steps to protect the confidentiality and security of the personal information you disclose to us from loss, misuse, unauthorized access, disclosure, alteration, or destruction. Specifically, we use industry-recognized security standards and we continuously maintain a variety of physical, technical and administrative safeguards. We also update and test our security technology on an ongoing basis using internal and external resources.

We also restrict access to your personal information only to those employees that need to know in order to provide services or benefits to you. Anyone with access to this information is subject to strict confidentiality obligations and may be either disciplined or terminated if they fail to meet these obligations.

Likewise, where you use a username, password or other special access features on our site, it is your responsibility to safeguard them. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of an account you have with us has been compromised), you must immediately notify us of the problem.

Reviewing, Updating or Deleting Your Information

You are responsible for ensuring the accuracy of the personal information you submit to us. Inaccurate information may affect your ability to access our services and our ability to contact you. If you believe that we may have incorrect information, or if you would like to review, update or delete your personal information, please contact us at info@babelstreet.com.

In general, we retain information under our control, including personal data, for specific periods of time due to legitimate business, tax or legal purposes. If you have any questions about data retention, please contact us at info@babelstreet.com.

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 and other technologies 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.

If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or to be given the choice of declining or accepting the transfer of a particular cookie, or cookies from a particular web site. However, please note that the use of cookies is required for our site to function properly.

Do Not Track Signals

We currently do not honor Do Not Track browser signals; however, we do not share, sell, rent or trade any personal information to third parties for marketing or promotional purposes.

Links to Other Web Sites

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

European Union Provisions

The mission of our company is to help our customers locate relevant and timely publicly available information without 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 what sources they will search. After receiving training on the use of our platform, customers handle and manage their own information collection.

In order to process our business transactions, we obtain a limited amount of personal data from our customers. Accordingly, we use and hold that information out of necessity for the performance of the contract to which the data subject is a party.

Individuals are provided a variety of rights under European law and the General Data Protection Regulation (GDPR), including but not limited to, the right to be informed about the use of personal data, the right of access and correction, the right to data erasure and the right to lodge a complaint with a supervisory authority. If you are a resident of the EU and have any questions about your rights or would like more information regarding the pursuit of one of your rights, please reach out to us at info@babelstreet.com.

Our site and our services are hosted in the United States; therefore, personal data we receive will be transferred to a country outside of the European Economic Area. However, Babel Street protects the rights of our customers during the transfer of information using the Model Contract Clauses.

Our EU Supervisory Authority is the Information Commissioner's Office, located in the UK:

Information Commissioner's Office (ICO)

www.ico.org.uk

Wycliffe House, Water Lane

Wilmslow

Cheshire SK9 5AF

Phone: 01625 524 510

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. However, we understand the importance of protecting the privacy of children online. If we learn that any personal information has been collected from a child under 13, we will immediately delete that

information. In addition, if you believe that we have received information from a child under the age of 13, please contact us at info@babelstreet.com.

Changes to our Privacy Policy

We reserve the right to update or amend this Privacy Policy at any time. If we update our policy, the most current privacy policy will always be accessible on this page so you are aware of what information we collect, how we use it, and under what circumstances we disclose it.

We will only use your personal information in accordance with this Privacy Policy and by continuing to use this site and our products or services, you both acknowledge and accept this Privacy Policy. If we make a material change to this Policy, we will inform our customers and add a notice to our website, highlighting the change. The provisions contained in this Policy supersede all previous policies or statements regarding our privacy practices.

Contact Us

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

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