



## Privacy Policy

Last Updated: July 16, 2021

Babel Street® was founded on the importance of understanding data and we value the trust our customers, our partners and our website visitors place in us. The responsible use and protection of personal and confidential information under our care is a core value of Babel Street, Inc. (“**Babel Street**”). Therefore, we want you to be familiar with how we handle information relating to you as an individual, known as personal information.

This Policy describes our practices for the information we collect, use and disclose, with a separate section which describes our customers’ use of the Babel Street products.

We gather information through the ways listed below:

- our website located at [www.babelstreet.com](http://www.babelstreet.com)
- the products available through our analytics platform (our “Products”) described at [www.babelstreet.com/platform](http://www.babelstreet.com/platform), which includes our mobile application
- our LinkedIn page located at [www.linkedin.com/company/babel-street](http://www.linkedin.com/company/babel-street)
- our Twitter accounts, which include @Babel4business and @Babelknowledge
- our corporate events, such as technology conferences, networking events, tradeshows or trainings

### About Our Products

The mission of our company is to help our customers retrieve and make sense of large volumes of relevant 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 are interested in and which data sources they would like to search.

### Types of Information We Collect

Babel Street collects information about visitors to our website and/or corporate events, potential and current customers, suppliers, or partners in connection with our Products, or when you otherwise interact with us. This can include:



**1. 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 or Tweets
- financial and transaction data, including purchase history, payment and billing information
- information given to us by customers and other individuals, such as referrals or other contacts

**2. Information required to operate our business or information provided during use of our Products, such as:**

- information necessary to register and secure customer accounts, including a username (Babel Street customers may designate any username they choose during the process of onboarding to the Babel Street platform; therefore, no personal information is required to be included in the username)
- other information relating to your interactions with Babel Street, including requests for customer or sales support, feedback, and payment for the purchase of our Products
- information provided when you visit our website or any of our offices, or attend a Babel Street technology event

**3. Usage, analytics and navigational information, such as:**

- clickstream information, such as which search engines our website visitors use most frequently
- uses of our software and the frequency of customer interactions with content within our platform
- IP address, which is only collected from customers upon logging in to the Babel Street platform
- general information logged through use of our mobile application after an error occurs, such as operating system type and version, device brand and device year

To the extent information that we collect, receive or use for our business purposes 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.

When you become a Babel Street customer, 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.



## How We Use Information

We use personal information for our legitimate business purposes including:

### 1. Providing 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.

### 2. Product improvement:

- to better understand our customers and their Product interactions and uses so that we can improve and enhance our offerings
- to maintain, develop and market our Products

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

### 3. Product and customer support:

- to resolve customer issues or answer customer questions
- to inform and communicate with customers about improvements or updates to our Products, features 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.

### 4. Accomplishing our business purposes:

- for accounting, bookkeeping and audits, to verify that our internal processes function as intended and are compliant with legal, tax, regulatory or contractual requirements
- for website administration, analytics and the security of our Products
- to improve the safety and reliability of our Products
- 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.

**5. To deliver marketing content and enable social sharing:**

- to deliver marketing communications and content with information about our Products and our company
- to facilitate a social sharing functionality that you may 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 Products 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](mailto:info@babelstreet.com). Please note that if you are a current customer and opt-out of receiving marketing-related messages from us, we may still send you important administrative messages related to your account, from which you cannot opt-out.

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

**6. Participation in our events:**

We use your information when 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.

**7. 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 for any business purpose.

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

## **When We Disclose Information**

We disclose information in the following situations:



- **To our third-party service providers, to facilitate services they provide to us:** These 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 Products.
- **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, customers 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.

## Information Which May Be Collected by Customers

The Babel Street Products make a variety of publicly and commercially available data sources and search tools available to customers, who then decide which sources to search. Babel Street's customers actively design, select and initiate searches of publicly and commercially available information based on the purposes relevant to their organizations' goals and missions, and subject to any legal requirements applicable to them. Babel Street is not a bulk data provider. It acts at the customer's direction, and the customer determines whether and how to process, retain, and delete any data (which may or may not include personal data) that it retrieves through its searches.

Therefore, distinct from any information that is collected by Babel Street for its own business purposes, customers can retrieve other information through their use of Babel Street Products, such as:

- information from publicly and commercially available data sources, including: news outlets, blogs, message boards, consumer sites, social media platforms, and traditional web or deep and dark web searches
- other information which customers may 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

Any data collected by customers will be dependent on the nature of information available in the online universe at the time of the search, along with the data sources selected by the customer and the design of the customer's search.

If a Babel Street customer searches for personal data in connection with his or her organization's use of the Babel Street Products, the customer contractually represents to Babel Street that his or her organization has the authority to conduct such searches and retrieve any associated data.

## Security

No method of transferring data over the internet or system of data storage can be guaranteed to be 100% secure. However, Babel Street follows industry standard security protocols and employs a variety of appropriate technical and organizational security measures designed to ensure the security of our Products. Specifically, Babel Street has registered its status as compliant with the U.S. DoD Supplier Performance Risk System for NIST 800-171, a leading set of standards for information security in the SaaS realm.

## 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 [privacy@babelstreet.com](mailto:privacy@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 executing 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](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 or tax 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 site, 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 our site and our Products and allow us to evaluate usage 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 customers and potential customers use our website. This information assists us with providing more relevant products and features, communicating value to our customers and providing appropriate staffing and resources to meet our customers' needs.

We use several types of cookies on our website:

- **Analytics-** These cookies collect information about the usage of our website and related statistics on how users interact with our site.
- **Performance-** These cookies help us understand and improve how the website and our Products 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 site remains up and running for our customers and partners.
- **Security-** These cookies process information to help us secure our Products, as well as detect fraud and abuse.

## Links to Other Web Sites

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

## Sensitive Information

We ask that you not send us, and you do 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) through communications with us or use of our Products.

## Cross-border Transfers

Your personal information may be stored and processed in locations where we have facilities or in which we engage service providers, and, by using and interacting with the Babel Street Products, you understand that your personal information may 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 Products 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 described in the 'Contact Us' section below.

## California Residents

Under the California Consumer Privacy Act (CCPA), Babel Street operates as a service provider to our customers. Babel Street's customers determine which of our Products are best suited to their specific needs and goals, and we provide such Products at our customers' direction. This Policy does not apply or extend to our customers' uses of our Products. If you are a current customer and have questions about this topic, please contact [privacy@babelstreet.com](mailto:privacy@babelstreet.com).



## 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 this Policy

We reserve the right to update or amend this Policy. 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 Policy or the privacy practices of Babel Street, please contact us at [privacy@babelstreet.com](mailto:privacy@babelstreet.com):

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