

## Initiative Labs Privacy Policy

Version August 4, 2023

Initiative Labs LLC (“Initiative Labs”, “we”, or “us”) offers speaking services and business support services to clients (“Users”) including websites and pages located at InitiativeLabs.com and other Initiative Labs websites (“Initiative Labs Websites”), as well as interactions related to engagement with Initiative Labs (“Initiative Labs Interactions”), including our directors, officers, employees, judges, interns, agents, and others (the “Initiative Labs Team”) (all collectively the “Initiative Labs Services”).

We protect your personal information using industry-standard safeguards. We may share your information with your consent or as required by law, and we will always let you know when we make significant changes to this Privacy Policy. Maintaining your trust is our top priority, so we adhere to the following principles to protect your privacy:

We protect your personal information and will only provide it to third parties: (1) with your consent; (2) where it is necessary to carry out your instructions; (3) as reasonably necessary in order to provide our features and functionality to you; (4) when we reasonably believe it is required by law, subpoena or other legal process; or (5) as necessary to enforce our User Agreement or protect the rights, property, or safety of Initiative Labs, its Users, and the public.

We have implemented appropriate security safeguards designed to protect your information in accordance with industry standards.

We may modify this Privacy Policy from time to time, and if we make material changes to it, we will provide notice through our Services, or by other means so that you may review the changes before you continue to use our Services. If you object to any changes, you discontinue using our Services. Continuing to use our Services after we publish or communicate a notice about any changes to this Privacy Policy means that you are consenting to the changes.

Please note that certain Services or parts of Initiative Labs Websites and Initiative Labs Interactions may have separate terms of use and privacy policies (“Special Rules”), which will govern your use of those Initiative Labs Websites and Initiative Labs Interactions. In the event that there is a conflict between the Special Rules and this Privacy Policy or the Initiative Labs User Agreement, the Special Rules shall govern, followed by the Initiative Labs Privacy Policy, and then the Initiative Labs User Agreement.

For California residents, additional disclosures required by California law may be found in our California Privacy Disclosure.

### **What Information We Collect**

Our Privacy Policy applies to any User. We collect information when you use our Services to offer you a personalized and relevant experience, including your pursuit of business opportunities. The personal information provided to or collected by our Services is controlled by Initiative Labs. If you have any concern about providing information to us or having such information displayed on our Services or otherwise used in any manner permitted in this Privacy Policy and the User Agreement, you should not

become a User, visit any Initiative Labs Websites, or otherwise use our Services. If you have already registered, you can terminate your registration.

## **How We Collect Information**

*Registration* – When you register with us, we collect information (including your username, email address, and, if applicable, password). Our User Agreement and this Privacy Policy governs how we treat your information. You may provide additional information during the registration flow to help you access customized services.

*Customer Service* – We collect information when you contact us for customer support. If you access any of the Initiative Labs Websites or one of our cookies on your device identifies you, your usage information and the log data described in this Privacy Policy, such as your IP address, will be associated by us with you. When you use our Services, we log information about devices used to access our Services, including IP address.

*Cookies* – We use measurement and customization technology known as a "Cookies." These Cookies are used to remember a User's online interactions with the Initiative Labs Websites in order to conduct measurement and analysis of usage or to customize the User's experience. There are two kinds of Cookies used on the Initiative Labs Websites. A single-session Cookie (Tier 1) is a line of text that is stored temporarily on a User's computer and deleted as soon as the browser is closed. A persistent or multi-session Cookie (Tier 2) is saved to a file on a User's hard drive and is called up the next time that user visits a website. Use of these Cookies does not involve the collection of a User's personal identification information (PII). Initiative Labs does not use the information associated with Cookies to track individual user activity on the Internet, nor does it share the data obtained through such technologies, unless otherwise provided under the User Agreement or this Privacy Policy, nor does it keep a database of information obtained from the use of Cookies. You can control Cookies through your browser settings and other tools. By visiting our Services, you consent to the placement of Cookies and beacons in your browser and HTML-based emails in accordance with this Privacy Policy. For reference, opting out of Cookies still permits Users to access comparable information and services; however, it may take longer to navigate or interact with any Initiative Labs Websites if a User is required to fill out certain information repeatedly.

*Log Files, IP Addresses, and Information About Your Computer and Mobile Device* – We collect information from the devices and networks that you use to access our Services. When you visit or leave our Services by clicking a hyperlink or when you view a third-party site that includes our plugin or cookies (or similar technology), we automatically receive the URL of the site from which you came or the one to which you are directed. We also receive the internet protocol ("IP") address of your computer or the proxy server that you use to access the web, your computer operating system details, your type of web browser, your mobile device (including your mobile device identifier provided by your mobile device operating system), your mobile operating system (if you are accessing the Initiative Labs Websites using a mobile device), and the name of your ISP or your mobile carrier.

*Other Collection Methods* – In addition, we are constantly innovating to improve our Services, which means we may create new ways to collect information on the Services. Our Services are a dynamic, innovative environment, which means we are always seeking to improve the Services we offer you. We often introduce new features, some of which may result in the collection of new information. If we

start collecting substantially new types of personal information and materially change how we handle your data, we will modify this Privacy Policy and notify you in accordance with this Privacy Policy.

## **How We Use Your Personal Information**

*Registration* – You agree that information you provide during registration can be seen by others and used by us as described in this Privacy Policy and our User Agreement. By providing personal information to us when you create or update your registration, you are expressly and voluntarily accepting the terms and conditions of our User Agreement and freely accepting and agreeing to our processing of your personal information in ways set out by this Privacy Policy. You can withdraw or modify your consent to our collection and processing of the information you provide at any time, in accordance with the terms of this Privacy Policy and the User Agreement, by changing your registration settings or by terminating your registration for any Initiative Labs Websites.

*Our Communications* – We may communicate with you using internal Initiative Labs messaging, email, and other ways available to us. We may send you messages relating to the availability of the Services, security, or other service-related issues.

*User Communications* – From time to time, we may allow you to send certain communications on our Services. In this event, the recipient may be able to see your name, email address, and some network information.

*Service Development & Customized Experience* – We use the information and content you provide to us to conduct research and development and to customize your experience and try to make it relevant and useful to you. We use information and content that you and other Users provide to us to conduct research and development for the improvement of our Services in order to provide you and other Users and other visitors with a better, more intuitive experience and drive User growth and engagement on our Services and to help connect professionals to economic opportunity. We also customize your experience and the experiences of others on our Services.

*Analytics* – We currently use a tool called “Google Analytics” to collect information about use of this site. Google Analytics collects information such as how often users visit the Initiative Labs Websites, what pages they visit when they do so, and what other sites they used prior to coming to the Initiative Labs Websites. We use the information we get from Google Analytics only to improve the Services. Google Analytics collects only the IP address assigned to you on the date you visit the Initiative Labs Websites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit the Initiative Labs Websites, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to any Initiative Labs Websites is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to any Initiative Labs Websites by disabling cookies on your browser.

## **Sharing Information with Third Parties**

Any information you put on your profile and any content you post on Initiative Labs Websites or provide through Initiative Labs Interactions may be seen by others. We don't provide any of your non-public information (like your email address) to third parties without your consent, unless stated under this Privacy Policy, required by law, or our belief that it is reasonably necessary to: (1) comply with a legal requirement or process, including, but not limited to, civil and criminal subpoenas, court orders or other compulsory disclosures; (2) enforce this Privacy Policy or our User Agreement; (3) respond to claims of a violation of the rights of third parties; (4) respond to User service inquiries; or (5) protect the rights, property, or safety of any of the Initiative Labs Websites, any of the Initiative Labs Interactions, our Services, our Users, or the public.

We do employ third parties to help us with the Services. These third parties have limited access to your information only to perform these tasks on our behalf and are obligated to Initiative Labs not to disclose or use it for other purposes.

We do not share any of your personal information with third parties for direct marketing.

## **Compliance with Legal Process and Other Disclosures**

We may disclose your personal information if compelled by law, subpoena, or other legal process, or, if necessary, to enforce our User Agreement. It is possible that we may need to disclose personal information, profile information, or information about your activities on any Initiative Labs Websites or through any Initiative Labs Interactions when required by law, subpoena, or other legal process, or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce the User Agreement, investigate and defend ourselves against any third-party claims or allegations, or protect the security or integrity of our Service; or (3) exercise or protect the rights, property, or safety of any Initiative Labs Websites, any Initiative Labs Interactions, our Users, personnel, or others. We attempt to notify Users about legal demands for their personal information when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. In light of our principles, we may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but do not commit to challenge every demand.

## **Rights to Access, Correct, or Delete Your Information, and Terminating Your Registration**

You can change your Initiative Labs User information at any time by terminating your registration. You can also ask us for additional information we may have about your registration. You have a right to (1) access, modify, correct, or delete your personal information controlled by Initiative Labs regarding your registration, (2) change or remove your content, and (3) terminate your registration. If you terminate your registration, your information will generally be removed from the Service within 24 hours. We generally delete terminated registration information and will de-personalize any logs or other backup information through the deletion process within 30 days of registration termination, except as noted below.

## **Data Retention**

We keep your information for as long as your registration is active or as needed. For example, we may keep certain information even after you terminate your registration for any Initiative Labs Websites or Initiative Labs Interactions if it is necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce this agreement. We retain the personal information you provide while your registration is in existence or as needed to provide you services. We may retain your personal information even after you have terminated your registration if retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes between Users, prevent fraud and abuse, or enforce this Privacy Policy and our User Agreement. We may retain personal information, for a limited period of time, if requested by law enforcement.

## **Safe Harbor**

We comply with the U.S.-E.U. and U.S.-Swiss Safe Harbor Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data from European Union User countries and Switzerland. We have certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.

## **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. If we make significant changes in the way we treat your personal information, or to the Privacy Policy, we will provide notice to you on the Services or by some other means, such as email. Please review the changes carefully. If you agree to the changes, simply continue to use our Services. If you object to any of the changes to our terms and you no longer wish to use our Services, you may terminate your registration. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your registration. Using our Services after a notice of changes has been communicated to you or published on our Services shall constitute consent to the changed terms or practices.

## **Security**

We take privacy and security seriously and have enabled HTTPS access to our site (turn on HTTPS), in addition to existing SSL access over mobile devices. Also, please know that the Internet is not a secure environment, so be careful and select strong passwords. We have implemented security safeguards designed to protect the personal information that you provide in accordance with industry standards. Access to your data on our Services is password-protected, and data such as credit card information is protected by SSL encryption when it is exchanged between your web browser and the Services. We also offer secure https access to the Initiative Labs Websites. To protect any data you store on our servers, we also regularly monitor our system for possible vulnerabilities and attacks, and we use a tier-one secured-access data center. However, since the Internet is not a 100% secure environment, we cannot ensure or warrant the security of any information that you transmit to us. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. It is your responsibility to protect the security of your login information. Please note that emails, instant messaging, and similar means of communication with other Users are not encrypted, and we strongly advise you not to communicate any confidential

information through these means. Please help keep your registration safe by using a strong password, if such option is provided.

### **Questions or to Contact Us**

If you have questions or comments about this Privacy Policy, please contact us via email at: please contact us via email at: [questions@initiativelabs.com](mailto:questions@initiativelabs.com) or by physical mail at: Initiative Labs LLC, 3592 Collins Ferry Road, Suite 250, Morgantown, WV 26505.

## Appendix A – California Privacy Disclosure

This notice describes the rights of Californians under the California Consumer Privacy Act of 2018 (“CCPA”). The CCPA requires businesses like Initiative Labs LLC (“Initiative Labs,” “we,” or “us”), which may receive information from more than fifty thousand California consumers, to provide certain information to them. We fully describe our practices to all our users in our Privacy Policy, but use this separate notice to ensure that we meet the CCPA’s requirements.

This notice contains the following four parts:

- We Do Not Sell Your Personal Information
- Your CCPA Rights
- The CCPA Categories of Personal Information We Collect and the Sources
- The CCPA Categories of Personal Information We Share for a “Business Purpose”

### **We Do Not Sell Your Personal Information**

The CCPA requires us to disclose whether we sell your personal information. We do not sell your personal information.

### **Your Rights Under the CCPA**

The CCPA provides Californians with the following rights:

*Requests for Information* – Like all of our members, you (or your authorized agent) can request a copy of your personal information. Authorized agents will be required to verify their identity. LinkedIn also will require members to confirm, by email from their primary account email address, that they granted the agent permission to submit the request. Under the CCPA, you can also request that we disclose how we have collected, used, and shared your personal information over the past 12 months, including the categories of personal information we collected and our purposes for doing so; the categories of sources for that information; the categories of third parties with whom we shared it for a business purpose and our purposes for doing so. Companies that sell personal information (we do not) must make additional disclosures. If you are not a LinkedIn member, you can submit your request here or can submit a request via an authorized agent. The authorized agent will be required to verify their identity, and you will be asked to confirm by email that you granted the agent permission to submit the request.

*Your Right to Opt Out of Sales* – We do not sell personal information, so we don’t have an opt out.

*Your Right to Notification* – Under the CCPA, a company like LinkedIn cannot collect new categories of personal information or use them for materially different purposes without first notifying you.

*Nondiscrimination for exercising your CCPA Rights* – The CCPA prohibits businesses from discriminating against you for exercising your rights under the law. Such discrimination may include denying services, charging different prices or rates for services, providing a different level or quality of services, or suggesting that you will receive a different level or quality of goods or services as a result of exercising your rights.

*Your Right to Delete Personal Information* – Like all of our members, you can request that we delete your personal information by closing your LinkedIn account. You also can request that we delete specific information. We honor such requests, unless an exception applies, such as when the information is necessary to complete the transaction or contract for which it was collected or when it is being used to detect, prevent, or investigate security incidents, comply with laws, identify and repair bugs or ensure another consumer’s ability to exercise their free speech rights or other rights provided by law.

**The CCPA Categories of Personal Information We Collect and the Sources**

Our Privacy Policy describes the information we collect and its sources. This notice organizes that information around the personal information categories set forth in the CCPA.

CCPA Personal Information Category	Sources of this Information
Identifiers (e.g., real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers)	<p>Information you provide directly or through your interactions with our Services (as defined in our <a href="#">Privacy Policy</a>) or partners (as described in Sections 1.2 and 2.4 of our Privacy Policy)</p> <p>Vendors that provide information to help us serve members relevant ads and understand the ads’ effectiveness Information from other LinkedIn members or customers</p>
Characteristics of protected classifications under California or Federal law (e.g., your gender or age) (“Characteristics of Protected Classifications”)	<p>Information you provide to us directly and inferences we make based on that information</p> <p>Information from our customers</p>
Commercial information (e.g., information regarding products or services purchased, obtained, or considered)	<p>Information you provide to us directly, such as to buy a Premium service</p> <p>Your interactions with our Services Information from our partners and customers</p>
Internet or Other Electronic Network Activity Information (e.g., browsing history, search history, and information regarding your interactions with our Services)	<p>Your interactions with our Services Your visits to third party sites that offer our autofill, follow or “Apply with</p>



	<p>LinkedIn” functionality, as needed for fraud prevention and security purposes.</p> <p>If you are a member, your interactions with the services of partners and customers that use the LinkedIn <u>Insight Tag</u> or similar technologies</p>
Geolocation Data	Information you provide to us directly or through your interactions with our Services, as explained in Section 1.5 of the Privacy Policy
Professional or Employment-Related Information	<p>Information you provide to us directly</p> <p>Information from our customers, partners, or from other members (e.g., if a connection endorses you)</p>
Inferences	<p>Information you provide to us directly or through your interactions with our Services</p> <p>Information from our customers and partners</p>
Personal information described in Cal. Civ. Code §1798.80(e)(such as name, address, telephone number, education, employment history, credit card or debit card number)	<p>Information you provide directly or through your interactions with our Services</p> <p>Information from our customers or partners</p>
Audio, electronic, visual or similar information	Information you provide directly or through your interactions with our Services, customers or partners

**The CCPA Categories of Personal Information We Share for a “Business Purpose”**

While we do not sell your personal information, we may share it to support our own operational purposes in providing Services to you, as described in our Privacy Policy. These operational purposes, known as “business purposes” under the CCPA, are described below. In addition, we may share

personal information at your direction, such as when you choose to communicate with other members through our Services.

*Auditing Interactions* – We may share the types of personal information listed in Section 3 with partners, service providers, and related companies, in order to audit interactions and transactions, such as to count or verify the positioning and quality of ad impressions.

*Security Purposes* – In order to secure our Services, including to detect, prevent and investigate security incidents or violations of our terms, policies, or applicable laws, we may share the types of personal information listed in Section 3 with our partners, service providers, law enforcement, and related companies.

*Service Improvements* – In order to improve our Services (such as to identify bugs, repair errors, or ensure that services function as intended) or conduct internal research and analysis to improve our technology, we may share the types of personal information listed in Section 3 with our partners, service providers and related companies.

*Service Providers and Other Notified Purposes* – We may share the types of personal information listed in Section 3 with Service Providers, as defined by the CCPA, in order to have them perform services specified by a written contract or with others for a notified purpose permitted by the CCPA (e.g., to respond to law enforcement requests).