

Theia Privacy Policy

1.0 WHAT THIS PRIVACY POLICY COVERS

1.1 General. This Privacy Policy describes how we, Theia, Inc., a Delaware corporation, collect, use, and handle your information when you use our website and services. We are committed to protecting and respecting your privacy and ensuring that your personal data is processed fairly and lawfully in line with all relevant privacy legislation. If you have any questions about this privacy policy, including any requests to exercise your legal rights please send an email with a subject of “Theia Website – Privacy Policy Inquiry” to insight AT hey-theia DOT com.

1.2 Companies Not Controlled. This Privacy Policy does not apply to the practices of companies that Theia does not own or control or to people that Theia does not employ or manage.

2.0 INFORMATION COLLECTION AND USE

2.1.1 General Collection. Theia collects personal information when you register as a Member or Guest with Theia, when you use Theia products or services, when you visit Theia pages or the pages of certain Theia partners, and when you enter promotions or sweepstakes. Theia may combine information about you that we have with information we obtain from business partners or other companies, or for the purposes of membership approval.

2.1.2 Information Sought and Collected. When you register with Theia, we ask for personal information such as your name, e-mail address, title, industry and other information that is not otherwise publicly available. Once you register with Theia and sign in to our website, you are not anonymous to us.

2.1.3 IP Address. Theia Web server automatically recognizes a visitor’s IP address. An IP address is a number assigned to your computer when you connect to the Internet. As part of the protocol of the Internet, Web servers can identify your computer by its IP address. In addition, Web servers may be able to identify the type of browser you are using or even the type of computer. Although it is not our practice to link IP addresses to your personally identifiable information, we reserve the right to use IP addresses to identify a user when we feel it is necessary to protect the compelling interest of our Website, users of our Website or others or to comply with laws, court orders, or law enforcement requests.

2.1.4 Use. Theia uses information for the following general purposes: to customize the content you see, fulfill your requests for products and services, improve our services, assist us in providing better products and services, contact you, conduct research, service your account

with us and respond to your questions, and to provide anonymous reporting to improve services.

2.2 Information Sharing and Disclosure

2.2.1 We have customers all over the world but to provide you with our services, we transmit your personal data to the United States. If you access the site from outside the United States, you consent to having your personal data transferred to and processed in the United States.

2.2.2 Sharing of Personal Information. Theia does not rent, sell, or share personal information about you with nonaffiliated persons or companies except to provide products or services you've requested, when we have your permission, or under the following circumstances:

2.2.2.1 We may provide the information to trusted partners who work on behalf of or with Theia under confidentiality agreements. These companies may use your personal information to help Theia communicate with you about offers from Theia and our marketing partners. However, these companies do not have the right to share your personal information or use it for any other reason.

2.2.2.2 We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;

2.2.2.3 We believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Theia's Terms of Use, or as otherwise required by law; and

2.2.2.4 We transfer information about you if Theia is acquired by or merged with another company. In such an event, Theia will notify you before your information is transferred and becomes subject to a different privacy policy.

2.2.3 Ad Targeting. Theia reserves the right to at some future date to display targeted advertisements based on personal information. Advertisers (including ad serving companies) may assume that people who interact with, view, or click on targeted ads meet the targeting criteria – for example, women ages 18-24 from a particular geographic area.

2.2.3.1 Theia does not provide any personal information to the advertiser when you interact with or view a partner promotions. However, by interacting with or viewing an ad you are consenting to the possibility that the advertiser will make the assumption that you meet the targeting criteria used to display the ad.

2.3 COOKIES

2.3.1 Rights Reserved. Theia may set and access Theia cookies on your computer. Cookies are short strings of text sent from a Web server to a Web browser when the browser accesses a Web site. In simplest terms, when the browser requests a page from the Web server that originally sent it the cookie, the browser sends a copy of the cookie back to that Web server. A cookie typically contains, among other things, the name of the cookie, a unique identification number, and an expiration date and domain name information. Cookies are used for personalization, tracking and other purposes. Cookies may be “session-only” or “persistent”. Persistent cookies last for more than one visit and are typically used to allow a visitor to our Web site to personalize their experience. We may use cookies to analyze the traffic on our Web site (such as total visitors and pages viewed), to personalize features or save you the trouble of retyping your name or other information, and to make improvements to the Web site based on the data we collect. We do not save passwords or other sensitive information in cookies. The use of cookies has become a standard in the Internet industry, especially at Web sites that provide any kind of personalized service. The use of cookies by content providers and advertisers has become standard practice in the Internet industry.

2.4 This Policy Not Applicable to Other Companies. Theia reserves the right to allow online promotions by other companies (e.g. IBM) on some of our pages which may set and access their cookies on your computer. Other companies’ use of their cookies is subject to their own privacy policies, not this one. Advertisers or other companies do not have access to Theia’s cookies.

2.5 Web Beacons. Theia may use Web beacons to access Theia cookies inside and outside our network of Web sites and in connection with Theia products and services.

2.6 Analytics. Theia utilizes third-party services such as Google Analytics to analyze site traffic. These services may collect information such as your computer’s operating system and browser type, IP address, address of a referring website, if any, etc. and may track a user’s path through our websites.

3.0 YOUR ABILITY TO EDIT YOUR INFORMATION AND PREFERENCES

3.1 Editing. You can edit your Theia Account Information at any time.

3.2 Theia Marketing and Newsletters. We may send you certain communications relating to Theia service, such as service announcements, administrative messages and Theia

Newsletters. If you do not want to receive these communications, you will have the opportunity to opt out of receiving them.

4 CONFIDENTIALITY AND SECURITY

4.1 Limited Access to Information. We limit access to personal information about you to employees who we believe reasonably need to come into contact with that information to provide products or services to you or in order to do their jobs.

4.2 Federal Compliance. We have physical, electronic, and procedural safeguards that comply with federal regulations to protect personal information about you.

4.3 Required Disclosure: Theia may share personal information with other companies, lawyers, credit bureaus, agents or government agencies in the following cases:

4.3.1 Harm. When there is reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (intentionally or unintentionally) the rights of Theia, its officers, directors or to anyone that could be harmed by such activities;

4.3.2 Law Enforcement. When it is believed in good faith that the law requires it;

4.3.3 Protection. Your Theia Account Information is password-protected.

4.3.4 SSL-Encryption. Most pages on the Theia Web site are browsable via https in order to protect data transmissions.

4.3.5 Credit Card Processing. We do not process any credit card transactions.

4.3.5.1 there are security and privacy limitations of the internet which are beyond our control;

4.2.5.2 the security, integrity, and privacy of any and all information and data exchanged between you and us through the websites cannot be guaranteed; and

4.2.5.3 any such information and data may be viewed or tampered with in transit by a third party. If you do not want to provide your personal information or attempt to complete an application.

5.0 CHANGES TO THIS PRIVACY POLICY

5.1 Updates to the Policy. Theia reserves the right to change this Privacy Policy at any time by posting revisions to this Web page. Such changes will be effective upon posting.

6.0 QUESTIONS AND SUGGESTIONS

6.1 Feedback. If you have questions or suggestions, please complete email insight@heytheia.com