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# Socure's Privacy Policy

*[Last updated January 2022]*

Hello! This Privacy Policy describes the privacy practices of Socure ("Socure," "we", "us" or "our" means Socure Inc. and our subsidiaries and affiliates, collectively) and how we handle personal information of people who visit us on the Internet (the "Sites" mean this website, our social media and other digital properties), and in real life (marketing and other live events).

This Privacy Policy is for the general public. Our Sites, products and services are primarily designed for business organizations and their representatives. At this time, we do not offer products or services for use by individuals for their personal, family or household purposes. When a business engages Socure for our identity verification and fraud prevention services, your personal information will come to us, either through their systems or directly from your phone. For questions on how that business handles your privacy, **please check in with the business** that sent you to Socure by reviewing their privacy policies and notices. You can also see our [Products & Services Statement](#).

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## Personal Information We Collect

### How:

- **You may provide us personal information** through our Sites, by visiting them, filling out forms or applying for a job. For job candidates that apply for positions through our site, please see our [Candidate Privacy Notice](#).
- **Third parties.** We also obtain personal information from other sources in order to build our identity verification and fraud prevention products and services.

### What: Information we hold includes

- **Contact data**, such as your first and last name, email address, billing and mailing address, professional title and company name, and phone number.
- **Demographic data**, such as your city, state, country of residence, and postal code.



- **Communications data**, based on exchange with you, including when you contact us with questions or feedback, through the Site, social media, chatbot, or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with us.
- **User-generated data**, such as comments, questions, messages, works of authorship, and other content or information that you generate, transmit, or otherwise make available on the Site, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third-party sources.** We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Our customers**, such as your employer, for purposes of account management.
- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Data providers**, such as information services and data licensors.
- **Marketing partners**, such as joint marketing partners and event co-sponsors.

**Automatic device data collection.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our marketing emails or clicked links within them.
- **Device data**, including your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G); device behavioral information (how the device and its applications are used); and other data used for misbehavior detection.
- **Geolocation/Location data** when you authorize us to access your device's location, or when you authorize a business to allow us as their service provider to access your device's location.

**Cookies and similar technologies.** Like many online services, we may use the following technologies:



- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating analytics and online advertising.
- **Local storage technologies**, like HTML5 and Flash, that provide cookie-equivalent functionality but can store larger amounts of data. This may include data stored on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email address was accessed or opened, or that certain content was viewed or clicked
- **Session Replay Technologies**, that employ software code to record users' interactions with the Site such as third party services provided by Hotjar (<https://www.hotjar.com/>), The replays include users' clicks, mobile app touches, mouse movements, scrolls [and keystrokes/key touches] during those sessions. These replays help us diagnose usability problems and identify areas for improvement.
- **Third Party Tracking Technologies**, provided by Google Analytics, LiftCertain, 6Sense, and others, to document users' interactions with Site, collect, analyze, and use some of the personal and pseudonymized data described in this policy. This data may be used for a variety of purposes, including online interest-based advertising as described [below](#).

**Data about others.** Users of the Site may have the opportunity to refer other contacts to us and share their contact information with us. Please do not refer someone to us or share their contact information with us unless you have their permission to do so.

## How We Use Your Personal Information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery.** We may use your personal information to:

- provide, operate and improve the Site and our business;
- enable security features of the Site, such as by sending you security codes via email, and remembering devices from which you have previously logged in;
- communicate with you about the Site, including by sending announcements, updates, security alerts, and support and administrative messages;
- provide support for the Site, and respond to your requests, questions and feedback.

**Research and development.** We may use your personal information for research and development purposes, including to analyze and improve the Site and our device risk insights. As part of these activities, we may create aggregated, de-identified or other anonymous data

from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Site and promote our business.

**Marketing and advertising.** We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you Socure-related or other direct marketing communications. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.
- **Interest-based advertising.** We may engage third-party advertising companies and social media companies to use the data collected from our Site to display our interest-based ads on third-party sites. These companies may use cookies and similar technologies to collect information about your interaction (including the data described in the [automatic data collection](#) section above) over time across the Service, our communications and other online services, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the [Your choices](#) section.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**With your consent.** In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

**To create anonymous, aggregated or de-identified data.** We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data identifiable to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Site and promote our business.

**Other Uses.** We also may use your information as may be described in a notice to you at the time the information is collected, or in any other manner to which you consent.

## How We Share Your Personal Information.

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection.

**Service providers.** Third parties that provide services on our behalf or help us operate the Site or our business (such as hosting, information technology, customer support, email delivery, marketing, and website analytics).

**Advertising partners.** Third-party advertising companies for the [interest-based advertising purposes](#) described above, for our business-to-business advertising efforts.

**Third parties designated by you.** We may share your personal data with third parties where you have instructed us or provided your consent to do so.

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.

**Business transferees.** Acquirers and other relevant participants in business transactions (or negotiations and diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Socure or our affiliates (including, in connection with a bankruptcy or similar proceedings).

## Your Choices

You have the following choices with respect to your personal information.

**Access or update your information.** If you have a business account with us, you may review and update certain account information by logging into the account or speaking to your Account Manager.

**Opt-out of marketing communications.** You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us at \[Privacy@Socure.com\]\(mailto:Privacy@Socure.com\)](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.





**Cookies & Browser Web Storage.** We may allow service providers and other third parties to use cookies, web beacons and similar technologies to track your browsing activity over time and across the Service and third party websites, including for marketing purposes and to provide services such as search engine optimization and lead generation. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Advertising choices.** You may be able to limit use of your information for interest-based advertising by:

- **Browser settings.** Blocking third-party cookies in your browser settings.
- **Privacy browsers/plug-ins.** By using privacy browsers or ad-blocking browser plug-ins that let you block tracking technologies.
- **Platform settings.** Google offers opt-out features that let you opt-out of use of your information for interest-based advertising:
  - Google: <https://adssettings.google.com/>
- **Ad industry tools.** Opting out of interest-based ads from companies participating in the following industry opt-out programs:
  - Network Advertising Initiative: [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)
  - Digital Advertising Alliance: [optout.aboutads.info](http://optout.aboutads.info).
  - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- **Mobile settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device from which you wish to opt-out.

**Do Not Track.** Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

**Access to Information and Consumer Rights.** You may request access to personal information about yourself that Socure holds by [contacting us](#). For personal information that we may have because a business has engaged us as an identity verification and fraud prevention service provider, you need to contact that business.



Additionally, if your personal information changes, or if you believe the information Socure holds is inaccurate, you may request to correct, update, amend or delete/remove inaccurate information by contacting us; except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated.

## Other Sites and Services

The Site may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications, or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites and mobile applications you use.

## Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

## International Data Transfer

We are headquartered in the United States and may have employees and use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

## Children

The Service is not intended for use by children under 13 years of age. If we learn that we have collected personal information through the Service from a child under 13 without the consent of the child's parent or guardian as required by law, we will delete it.

## Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on





the Service.

Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting).

## How to Contact Us

- Email: [privacy@socure.com](mailto:privacy@socure.com)
- Mail: 885 Tahoe Blvd, Suite 11, Incline Village, NV 89451
- Phone: (866) 932-9013

## Information for California Residents / Your California Privacy Rights Notice

**Scope.** This section applies only to California residents. It describes how we collect, use, and share Personal Information of California residents in our capacity as a “business” under the California Consumer Privacy Act (“**CCPA**”) and their rights with respect to that Personal Information. For purposes of this section, the term “**Personal Information**” has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA. In some cases, we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section. For personal information that we may have because a business has engaged us as an identity verification and fraud prevention service provider, you need to contact that business.

**Your California privacy rights.** As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
  - The categories of Personal Information that we have collected.
  - The categories of sources from which we collected Personal Information.
  - The business or commercial purpose for collecting and/or selling Personal Information.
  - The categories of third parties with whom we share Personal Information.
  - The categories of Personal Information that we sold or disclosed for a business purpose.
  - The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected about you.

- **Opt-out of sales.** You can opt out of our interest-based advertising, which is considered a “sale” of Personal Information under California law.
- **Opt-in.** If we know that you are 13-15 years of age, we will ask for your affirmative authorization to sell your Personal Information before we do so.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

**Right to information, access and deletion.** You may submit requests to exercise your right to information, access or deletion at [link to webform], calling us toll free at (866) 932-9013, or via email to [CCPA@Socure.com].

**Notice of right to opt-out of the “sale” of your Personal Information.** Like many companies, we use services that help deliver interest-based ads to you. Our use of some of these services may be classified under California law as a “sale” of your Personal Information to the advertising partners that provide the services because they collect information from our users (e.g., device data and online activity data) to help them serve ads more likely to interest you. You can request to opt-out of this “sale” of your personal information here: [Do Not Sell My Personal Information](#).

**Verification.** In order to respond to your request and to ensure we are dealing with a true and honest person, we will need to verify your identity. We also reserve the right to confirm your California residency. To verify your identity, we may require government identification, a declaration under penalty of perjury or other information. Your authorized agent may make a request on your behalf upon our verification of the agent’s identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with confirmation that you have given the authorized agent permission to submit the request.

**Personal information that we collect, use and disclose.** The chart below summarizes the Personal Information we collect by reference to the categories of Personal Information specified in the CCPA, and describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Statutory category and details of personal information (PI) (Cal. Civ. Code § 1798.140)	Source of PI	Business/ commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>You</li> </ul>	<ul style="list-style-type: none"> <li>Service delivery to our</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates</li> </ul>

<ul style="list-style-type: none"> <li>• Contact data</li> <li>• Demographic data</li> <li>• Job application data</li> <li>• User generated data</li> <li>• Communication data</li> </ul>	<ul style="list-style-type: none"> <li>• The business that engaged Socure for ID Verification services</li> <li>• Third-party sources</li> </ul>	<ul style="list-style-type: none"> <li>• customers</li> <li>• Research &amp; development</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Downstream service providers for our customers</li> <li>• The business that engaged us for identity verification services and other third parties designated by you</li> <li>• Professional advisors</li> <li>• Authorities and others for legal reasons</li> <li>• Business transferees</li> <li>• Marketing and advertising partners (website visitors only)</li> </ul>
<p><b><u>California Customer Records</u></b></p> <p>(as defined in California Civil Code section 1798.80)</p> <ul style="list-style-type: none"> <li>• Contact data of customer employees</li> <li>• Communication data</li> <li>• Customer user-generated data</li> </ul>	<ul style="list-style-type: none"> <li>• Our customers</li> <li>• You</li> <li>• Third-party sources</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Our business-to-business marketing &amp; advertising efforts</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers for our customers</li> <li>• Marketing and advertising partners for our business-to-business marketing</li> <li>• Third parties designated by you</li> <li>• Professional advisors</li> <li>• Authorities and others for legal reasons</li> <li>• Business transferees</li> <li>• Business and marketing partners</li> </ul>
<p><b><u>Commercial Information</u></b></p> <ul style="list-style-type: none"> <li>• Online activity data</li> <li>• Marketing data</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third-party sources</li> <li>• Automatic collection</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Our business-to-business marketing &amp; advertising efforts</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Downstream service providers</li> <li>• Third parties designated by you</li> <li>• Professional advisors</li> <li>• Authorities and others for legal reasons</li> <li>• Business transferees</li> <li>• Business partners</li> <li>• Marketing and advertising partners for our business-to-business marketing</li> </ul>
<p><b><u>Online Identifiers</u></b></p> <ul style="list-style-type: none"> <li>• Online activity data</li> </ul>	<ul style="list-style-type: none"> <li>• Automatic collection</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Our business-to-business marketing &amp; advertising efforts</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Downstream service providers</li> <li>• Third parties designated by you</li> <li>• Professional advisors</li> <li>• Authorities and others for legal reasons</li> <li>• Business transferees</li> </ul>

		<ul style="list-style-type: none"> <li>Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>Business partners</li> <li>Marketing and advertising partners for our business-to-business marketing</li> </ul>
<b><u>Internet or Network Information</u></b> <ul style="list-style-type: none"> <li>Online activity data</li> <li>Marketing data</li> </ul>	<ul style="list-style-type: none"> <li>Automatic collection</li> </ul>	<ul style="list-style-type: none"> <li>Service delivery</li> <li>Research &amp; development</li> <li>Our business-to-business marketing &amp; advertising efforts</li> <li>Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates</li> <li>Downstream service providers</li> <li>Third parties designated by you</li> <li>Professional advisors</li> <li>Authorities and others for legal reasons</li> <li>Business transferees</li> <li>Marketing and advertising partners for our business-to-business marketing</li> </ul>
<b><u>Inferences</u></b>  <i>May be derived from your:</i> <ul style="list-style-type: none"> <li>Contact Data</li> <li>Demographic data</li> <li>Job application data</li> <li>Online activity data</li> <li>Marketing data</li> <li>User-generated data</li> </ul>	N/A	<ul style="list-style-type: none"> <li>Service delivery</li> <li>Research &amp; development</li> <li>Our business-to-business marketing &amp; advertising efforts</li> <li>Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates</li> <li>Service providers</li> <li>Authorities and others for legal reasons</li> <li>Business transferees</li> <li>Business partners</li> <li>Marketing and advertising partners for our business-to-business marketing</li> </ul>
<b><u>Protected Classification Characteristics</u></b>  <i>We do not collect this information.</i>	N/A	N/A	N/A



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