

DISPERSE INC. PRIVACY NOTICE

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1. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA AND HOW TO CONTACT US

This notice (“**Notice**”) describes the steps Disperse Inc. (“**Disperse**”, “**Company**”, “**we**”, “**our**”, or “**us**”) take to protect the personal information that we process about our customers, individuals related or adverse to our customers and other business contacts.

In this capacity, Disperse is the entity responsible for the collection and processing of your personal information and acts as a data controller. A data controller is an entity that determines the means and purposes of the processing of personal information. Disperse's main establishment is at WeWork, 135 Madison Avenue, New York, NY 10016.

Disperse takes its data processing obligations and our legal, professional and ethical duties and obligations to protect personal information seriously. We protect your personal information through technical and organizational security measures to minimize risks associated with data loss, misuse, unauthorized access and unauthorized disclosure and alteration. To this end we use firewalls and data encryption, for example, as well as physical access restrictions for our data centers and authorization controls for data access.

The core business of Disperse is construction technology.

If you have any questions about this privacy notice or our privacy practices, please contact us at the address above or by email at support@disperse.io.

2. WHAT PERSONAL INFORMATION WE COLLECT AND WHY?

We may source, use and otherwise process your personal information in different ways.

In each of the sections listed below, we describe how we obtain your personal information and how we will treat it.

Section 2.1 Representatives of our Existing or Prospective Customers, Distributors and Vendors

Section 2.2 Personal information related to the Services that we Offer

Section 2.3 Visitors to our Premises

Section 2.4 Website Visitors

2.1 Representatives of our Existing or Prospective Customers and Vendors

A - Sources of personal information

We may obtain your personal information from the following sources:

- a) from you directly;
- b) from a company that employs you, if you are an employee of our customer and/or contractor;
- c) from visitors to our offices;
- d) from partners with whom we have a relationship;
- e) during networking events that we have either hosted, or sponsored, or attended; and/or
- f) from publicly available sources (for example, your company website or social media sites).

B - Personal information that we collect and process

We may collect the following categories of personal information relating to our corporate customers' employees, officers, authorized signatories, and other associated individuals. This may include:

- a) name;
- b) name of employer;
- c) business address;
- d) business email address;
- e) business telephone number;
- f) IP address;
- g) website user activity; and
- h) job title.

C - Why do we collect your personal information and what do we use it for?

Representatives of our Existing or Prospective Customers, Distributors and Vendors	
<i>We may use your personal information to:</i>	<i>Our purpose in doing so is:</i>
Establish and manage our relationship & provide you with our services	Efficiently fulfil our contractual and legal obligations Management reporting (including at an intra- group level)
Learn about how our products are or may be used	Efficiently fulfil our contractual and legal obligations

	Account management Exercise or defend legal claims Understand the market in which we operate Management reporting Provide technical support Account management
Manage security	Managing security, risk and crime prevention, including anti-money laundering Management reporting
Let you know about our products and events that may be of interest to you by letter, telephone, email or other forms of electronic communication	Promote our products and services Management reporting (including at an intra- group level)

Where we use your email to communicate marketing information to you we may need to obtain your prior consent to send such communications where required to do so by law.

2.2 Personal information related to the services that we offer

A - Sources of personal information

Your personal information may be processed when our customers use our services. Disperse processes images on construction sites that may capture images of individuals. The images are used for the provision and maintenance of our software and also to develop and improve our products and services, but the images of individuals are not used to provide the service.

B - Personal information that we collect and process

We may collect the following categories of personal information relating to our corporate customers' end-users:

- a) name;
- b) email address;
- c) IP address;
- d) user activity;
- e) Camera footage and environment scans;
- f) login credentials (username, password etc.).

C - Why do we collect your personal information and what do we use it for?

Data relating to you flowing through the products and services we provide our corporate customers	
<i>We may use your personal information to:</i>	<i>Our purpose in doing so is:</i>
Provide our customers with our services	Efficiently fulfil our contractual and legal obligations Management reporting
Establish and manage our relationship	Efficiently fulfil our contractual and legal obligations Account Management Exercise or defend legal claims Understand the market in which we operate Management reporting
Learn about how our products and services are or may be used	Understand the market in which we operate Management reporting Account Management
Demonstration to prospective customers	Promote and market our products to prospective customers

2.3 Visitors to Our Premises

A - Sources of personal information

We may obtain your personal information from you directly and/or from our systems' records.

B - Personal information that we collect and process

- a) name;
- b) business contact details;
- c) organization;
- d) role; and/or
- e) image (for example, from cameras).

C - Why do we collect your personal information and what do we use it for?

Visitors to our Premises	
<i>We may use your personal information to:</i>	<i>Our purpose in doing so are:</i>
Manage security	Managing security, risk and crime prevention
Maintain records of visitors to our premises	Management reporting

1.2 WEBSITE VISITORS

A - Sources of personal information

We may obtain your personal information from the following sources:

- a) from you directly (for example, by filling in forms on the website).
- b) when you register to use the website or for a trial period;
- c) subscribe to any of our services;
- d) request further information via the website
- e) when you report a problem with the website;
- f) from your device or browser; and/or
- g) if you contact us, we may keep a record of that correspondence.

B - Personal information that we collect and process

- a) name;
- b) username;
- c) email address;
- d) phone number;
- e) postal address;
- f) operating system;
- g) browser type;
- h) products or services you viewed or searched for;
- i) other website data, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- j) cookie data (for more information please see [Disperse Cookie Notice - http://disperse.design.s3.amazonaws.com/Disperse%20-%20Cookie%20Notice.pdf](http://disperse.design.s3.amazonaws.com/Disperse%20-%20Cookie%20Notice.pdf))
- k) preferences regarding online marketing; and/or
- l) IP address.

C - Why do we collect your personal information and what do we use it for?

Website Visitors	
<i>We may use your personal information to:</i>	<i>Our purpose in doing so is:</i>
Provide our website services to you, your employer or our clients	Website management Promote our products and services Account management Notifying you of any changes to our products
Establish and manage our relationship	Understand the market in which we operate

	Management reporting Account management Make suggestions and recommendations to you about products or services that may interest you
Learn about our websites(s) users' browsing patterns and the performance of our website(s)	Website management, including troubleshooting, data analysis, testing, research, statistical and survey purposes
Manage security	Managing security, risk and crime prevention Management reporting on security incidents
Let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication	Promote our products and services Management reporting
Learn about how our products or services may be used	Understand the market in which we operate Management reporting

We will seek your consent, where required to do so by law, where we:

- a) use cookies or similar technologies to fulfil this purpose; and/or
- b) use your email to communicate marketing information to you.

2. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH

We do not share your personal information with third parties for the marketing purposes of those third parties.

Intra-group Transfers to our Affiliates

We may share your personal information with our affiliates and subsidiaries, as set out In Annex 1.

Our Service Providers

We may disclose information about you to organizations that provide a service to us, on the understanding that they will keep the information confidential and will comply with relevant privacy laws.

We may share your information with the following types of service providers:

- a) our distributors who may contact you regarding Disperse products and services, if you indicated your desire to receive such offers;

- b) technical support providers who assist with our website and IT infrastructure;
- c) third party software providers, including 'software as a service' solution providers, where the provider hosts the relevant personal information on our behalf;
- d) professional advisers such as solicitors, accountants, tax advisors, auditors and insurance brokers.
- e) our advertising and promotional agencies and consultants and those organizations selected by us to carry out marketing campaigns on our behalf; and/or
- f) providers that help us store, collate and organize information effectively and securely, both electronically and in hard copy format (e.g. cloud service providers), and for marketing purposes.

Company Mergers and Takeovers

We may transfer your personal information to potential purchasers and their advisors, subject to appropriate confidentiality obligations, in the event of an initialization, preparation, or execution of a company acquisition (e.g. in the event we decide to dispose of all or parts of our business through a merger or assets sale). If such an event occurs, we will require the receiving entity to comply with this Notice with respect to your personal information. Should your personal information be processed for any purpose not specified in this Notice, you will be informed in advance of the processing of your data for this new purpose.

Legal and Regulatory Enforcement

If you have breached the terms of an agreement between us and you, abused your rights to use the website, or violated any applicable law. Your information may be shared with competent authorities and with any third party, if we believe it is necessary or justified.

4. RETENTION PERIOD

We will keep and process your personal information only for as long as is necessary for the purposes for which it was collected in connection with your relationship with us, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defense of legal claims or our legitimate interests.

Users and their contact data are removed within a business day from all databases, except server logs.

5. CALIFORNIA RESIDENTS

Notwithstanding anything to the contrary in this Notice, the following provisions apply with respect to California residents from whom we collect personal information:

Do We Respond to Do Not Track Signals? Our websites currently do not have the ability to respond to "Do Not Track" signals or other mechanisms that give you the ability to choose whether personally identifiable information about your online activity (on our websites and other third party online services) is tracked over time.

Please see [Disperse Cookie Notice](#) for details of third parties that may track your online activity over time.

6. CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice at any time by posting the revised Privacy notice on this website and indicating the effective date of the revised Privacy Notice. This version was last updated on 11/29/2019.

ANNEX 1: DISPERSE ENTITIES

Disperse Entity

Disperse.io LTD
Disperse LLC
Disperse.io d.o.o.

Country

England
Armenia
Bosnia and Herzegovina