



# SPARKnit

## Privacy Policy

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Last updated: April 28<sup>th</sup>, 2019

### 1. INTRODUCTION

YOUR PRIVACY IS IMPORTANT TO US. SPARKnit is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal and application data we collect from you, that you provide to us, or that is provided to us by a subscriber to our services, will be processed and managed by us. This Privacy Policy applies to the [www.sparknit.com](http://www.sparknit.com) website (the "Site") and the SPARK Community website (collectively, the "Services") and any other software, tools, applications or materials/contents related to the Site and Services owned by SPARKnit Inc. ("SPARKnit", "Us", "We", "Our"). This Privacy Policy applies when you access, visit or use any portion of the Services. This Privacy Policy is part of, and is governed by, the SPARKnit Terms of Use.

For the purposes of personal information and data, SPARKnit's policy is designed to meet the requirements and uphold the principles in the European Union's (EU) General Data Protection Regulations (GDPR).

As this Privacy Policy forms part of the terms of use of the Services, we encourage you to periodically check for updates. If you have questions or complaints regarding our Privacy Policy, please contact us at [info@sparknit.com](mailto:info@sparknit.com).

This Introduction is an integral part of this Privacy Policy.

### 2. INFORMATION WE COLELCT

#### 2.1 User Data

We use User Data to receive certain services we provide, or to provide an online customer support when create an account to you, or to provide you with information when register to SPARK Community Page, or when you subscribe to our newsletter(s) or when you register for events/webinars or give to SPARKnit in other ways. You may be required to register with us and, in connection with such registration, to provide certain Personal Data (e.g. your name, address, email, phone number, sign-in name, password, position, company name, country and email address or otherwise). We use such information to provide the service you requested, and to contact you from time to time about us, our website, and our products and services. SPARKnit does not ask for, access, or track any location-based information from your device at any time while downloading or using our Applications and Services.

#### 2.2 Application Data

We have no access to any of our services you download at your computer (i.e. the forms you build and any data that was collected from those forms) unless we request you to provide us with credentials to access your data for issues handling and bug fixing. In this case, we respect the privacy of all users, and consider all data that may viewed by us to be private. Your information is used

strictly for internal purposes, and we will not distribute or sell your information to a 3<sup>rd</sup> party, except as disclosed in this statement. Specifically speaking regarding to SPARK Forms builder, your data will be stored in a clouding SharePoint Servers as SPARK installed on and you hereby consent to MS Office 365 terms and policies.

### **3. PURPOSE OF THE USE AND SHARING INFORMATION**

- We use the information we collect from you to perform the Services and/or perform supports requested from you.
- We use your information to review, investigate, and analyze how to improve the services provided. We may also collect and analyze your data to monitor, maintain and improve our services and features.
- We internally perform statistical and other analysis on information we collect (including usage data, device data, referral data, question and response data, and information from page tags) to analyze and measure user behavior and trends, to understand how people use our services, and to monitor, troubleshoot, and improve our services, including to help us evaluate or devise new features.
- We may use your information for internal purposes designed to keep our services secure and operational, such as testing purposes, troubleshooting, to prevent abusive activity (i.e. fraud, spam, phishing activities), and for service improvement.
- We may collect your personal data for the purposes of answering your questions and provide you tips and news regarding the Services by any means, including email and similar means of electronic communication.
- We do not sell your data to third parties without your permission. We share your information with our service providers who help us to provide our services to you.
- Your data is not disclosed to any third party except:
  - o For providing the services you requested and for which Services collaborates with third parties,
  - o When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request,
  - o To any other third party with your prior consent to do so,
  - o When we have your permission,
  - o When it is required by a competent authority in the exercise of its duties (for example in order to investigate, prevent, or take action regarding illegal activities), or
  - o If SPARKnit is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information,
  - o As otherwise required by law.
- We do not use your data other than as described in this Privacy Policy and the Terms of Use.
- If your personal data is subject to the EU's GDPR, SPARKnit ensures that the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU, such as the European Commission approved standard contractual clauses.

### **4. COOKIES AND OTHER TRACKING TECHNOLOGIES**

In common with most other websites, SPARKnit and its affiliates, analytics partners, marketing partners, or service providers use cookies and similar technologies to analyze trends and to manage your session on the SPARKnit website.

Tracking technologies are used to make your visits easier in several ways: necessary session management; performance enhancement; and functionality. Cookies and other similar technologies help manage your session so that you can move easily from one page to another, so that your page requests are loaded in a smooth, consistent, and secure manner, and to track user traffic patterns using statistics from users' visits to the SPARKnit website. These technologies also make your next visit easier by authenticating sign-ins to the parts of the site that are for registered users, to enable you to submit forms or other information through the website, to initiate downloads of content, and otherwise store any preferences or selections you set through the website. Finally, these technologies make the site more useful. This remembered information helps us understand how people use the website and gives us explicit information about the technologies that we use and your choices when it comes to these technologies. As true of most websites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We do not link this automatically collected data to any other information we collect about you.

Cookies are small text files that are placed in visitors' computer browsers to store their preferences. You may configure your browser so that you are notified before a cookie is downloaded or so that your browser does not accept cookies. Please note, however, that by blocking or deleting cookies used on the SPARKnit website, certain features of the website may not function correctly and you may not be able to take full advantage of the website.

Our site contains links to other websites, including those of our partners, whose information practices may be different from ours. Visitors should consult those other third-party websites' privacy notices, since those websites are not covered by this Privacy Policy and may follow different procedures. From time to time, we also partner with third parties who may place cookies on your browser when you visit our website, may send their own cookies to your cookie file, and may use those cookies to provide targeted advertising based on your interests and previous browsing history.

## **5. OPTING OUT OF EMAILS/NEWSLETTER**

You may choose to stop receiving our newsletter or marketing emails by contact us at [info@sparknit.com](mailto:info@sparknit.com).

## **6. RETENTION OF YOUR INFORMATION**

We retain information for active Accounts as long as it is necessary and relevant for our operations. In addition, we may retain information from closed accounts to comply with the law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation and take other actions permitted by law. The information we retain about you will be handled in accordance with this Privacy Policy. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at [info@sparknit.com](mailto:info@sparknit.com).

## **7. LINKS TO OTHER SITES**

You may access third party websites and services through this website. If you submit personal information to any of those sites, your information is governed by their privacy policies. These websites are not subject to SPARKnit's Privacy Policy. You should review the Privacy Policy of each individual website you access via hyperlinks from this web site and assess whether the policy of each website is satisfactory to you before you use that website.

## **8. DATA STORAGE AND INTERNATIONAL TRANSFERS**

Information that you submit via the Site is held on servers in the USA. This information may be transferred to other countries, for example to other of our SPARKnit offices or where one of our service providers or partners is located in another country. If we transfer your information in this way, we will take steps to ensure that your privacy rights continue to be protected.

## **9. SECURITY**

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received. If you have any questions about the security of your personal information, you can contact us at [info@sparknit.com](mailto:info@sparknit.com).

## **10. CHANGE THIS PRIVACY POLICY**

We may amend this Privacy Policy from time to time. We may post any material changes to this Privacy Policy on the Site with a notice advising of the changes in advance of the effective date of the changes. We may also notify you of material changes to this Privacy Policy, before the effective date of the changes by sending an email or in another conspicuous manner to give you a reasonable notice period. We encourage you to periodically review this page for the latest information on our privacy practices.

## **11. POLICY ACCEPTANCE**

By using our Site, Services and the support Services we provide, you signify your acceptance of this Privacy Policy. If you do not agree or are not comfortable with any policy described in this Privacy Policy, you may discontinue use of the Services.

## **12. QUESTIONS**

If you have any questions or comments regarding this Privacy Policy, please feel free to contact us at [info@sparknit.com](mailto:info@sparknit.com).