

## **ViewLift Privacy & Cookie Policy**

Thank you for visiting ViewLift.com (“Site”), a SnagFilms, Inc. d/b/a ViewLift (“ViewLift”) website. Our primary business address is 665 Broadway, Suite 700, New York, NY 10012.

By visiting the Site, you are accepting this Privacy Policy. If you do not want information about you to be used in the manner set forth in this Privacy Policy, please do not use the Site and contact us at [privacy@viewlift.com](mailto:privacy@viewlift.com) to request the deletion of any personally identifiable information that we may hold on you.

Your privacy is important to us and we know that you care about how we protect your information, including your personally identifiable information. This Policy covers information ViewLift collects when you use our Site, as well the nature of our relationships with those third parties that provide services either on, through or in connection with the Site. This Policy explains how your information is collected, used and shared by ViewLift.

ViewLift offers a digital platform for third parties (our “Content Providers”) to stream live and on-demand content to their end users. The Site provides a description of our software-as-a-service products and solutions, which include marketing, data and analytics tools. Other websites, applications or platforms may be co-branded with our name or logo, even though they are not operated or maintained by us. ViewLift is not responsible for the privacy practices of the websites, applications or platforms operated by third parties. If you are using another website, application or platform, you should check its privacy policy to determine how it handles any information it collects from you.

Please also note that we do not consider any companies that are within our “family” of companies to be “third parties” for purposes of this Policy. Thus, we also may share information provided with SnagFilms, Inc. affiliates. Any of these companies may use and further share this information in the same ways we do. However, if we pass on personally identifiable information or other data to an affiliate, we require that it protect such information in a manner that’s consistent with this Privacy Policy.

### **I. INFORMATION WE COLLECT**

#### **Information you provide directly to us.**

- your first and last names, user name, email address, billing address, telephone number and password (in hashed form);
- information provided by you when you use our interactive Site features, including when posting reviews, comments, ratings and content preferences;
- emails you send to us; and
- credit card information.

#### **Information automatically collected when you visit and interact with the Site.**

- your usage behavior, such as the dates and times of your visit to the Site, the pages viewed, links clicked on, videos streamed, and search queries;
- the type of device you are using and screen resolution;
- the type of browser you are using (e.g., Firefox, Internet Explorer, Chrome);
- the type of operating system you are using (e.g., Microsoft Windows or Mac OS);
- the domain name of your Internet service provider;
- your computer’s Internet Protocol (IP) address and bandwidth speed;
- your Wi-Fi information;
- unique identifiers, including mobile device identification numbers, that can identify physical location of your devices in accordance with applicable law;
- the web pages you were visiting immediately before and after you came to the Site and search terms you used to reach the Site;
- aggregated data about email click-through rates and user video viewing; and
- information collected via cookies, web beacons, and similar technologies.

**Information collected by cookies.** To enhance your experience, many of our web pages use “cookies.” Cookies are text files we place in your computer’s browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information unless you choose to provide this information to us by, for example, completing an online form at the Site. However, once you choose to furnish the Site with personally identifiable information, this information may be linked to the data stored in the cookie.

We use cookies to understand Site usage and to improve the content and offerings on our Site. For example, we may use cookies to personalize your experience at our web pages (e.g., to recognize you by name when you return to our Site) or save your password in password-protected areas. You may choose not to accept our cookies, but doing so may disable some of the features available on our Site. Here are the types of cookies we use and their purposes:

Type of cookies	Purpose
<i>Essential Cookies</i>	These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Site and help the content of the pages you request load quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.
<i>Functionality Cookies</i>	These cookies allow our Site to remember choices you make when you use our Site, such as remembering your language preferences, remembering your login details and remembering the changes you make to other parts of our Site, which you can customize. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Site.
<i>Analytics and Performance Cookies</i>	<p>These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered does not identify any individual visitor. The information is aggregated and anonymous. It includes the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.</p> <p>We use Google Analytics and other third party analytics services for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Site works. You can find out more information about Google Analytics cookies here: <a href="https://developers.google.com/analytics/resources/concepts/gaConceptsCookies">https://developers.google.com/analytics/resources/concepts/gaConceptsCookies</a>. You can find out more about how Google protects your data here: <a href="http://www.google.com/analytics/learn/privacy.html">www.google.com/analytics/learn/privacy.html</a>.</p> <p>You can prevent the use of Google Analytics relating to your use of Site by downloading and installing the browser plugin available via this link: <a href="http://tools.google.com/dlpage/gaoptout?hl=en-GB">http://tools.google.com/dlpage/gaoptout?hl=en-GB</a>.</p>
<i>Targeted and advertising cookies</i>	These cookies track your browsing habits to enable us to show advertising which is more likely to be of interest to you. These cookies use information about your browsing history to group you with other users who have similar interests. Based on that information, and with our permission, third party advertisers can place cookies to enable them to show advertisements we think will be relevant to your interests while you are on third party websites. You can disable cookies, which remember your browsing habits and target advertising at you by visiting <a href="http://www.youronlinechoices.com/uk/your-ad-choices">http://www.youronlinechoices.com/uk/your-ad-choices</a> , <a href="http://www.aboutads.info/choices">http://www.aboutads.info/choices</a> or <a href="http://www.networkadvertising.org">http://www.networkadvertising.org</a> . If you choose to remove targeted or advertising cookies, you will still see advertisements but they may not be relevant to you. Even if you do choose to remove cookies by the companies listed at the above link, not all companies that serve online behavioral cookies are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.
<i>Social Media</i>	These cookies are used when you share information using a social media sharing button or “like” button on our Site or you link your account or engage with our content on or through a social

<i>Cookies</i>	networking website such as Facebook, Twitter, or Google+. The social network will record that you have done this.
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**Information provided to us from our third party content providers.** In some cases, our Content Providers or other third parties who use our technology may provide us with information, including personally identifiable information. We use this information to provide the services to you.

**Information provided to us from other sources**

- non-personally identifiable demographic data collected by Google Analytics (such as age range, gender and interests);
- non-personally identifiable information from other commercially available sources, such as data aggregators, public databases, online marketing firms, ad targeting firms, or our Content Providers, which may include your age, gender, interests, purchasing behavior and your online activities, such as websites visited and advertisements viewed; and
- to the extent you log on to our Site using a social media site, we will use information that you allow to be shared under your social media settings.

**II. COLLECTION OF INFORMATION BY OTHERS**

Some of our pages contain links to other sites whose information practices may be different than ours. Please note that third parties, including our Content Providers, may independently collect data about you, including your IP address and information about the websites you visit and the links you click, through cookies, clicks on links, or other means when you visit the Site. Visitors should consult the other sites’ privacy notices. Please be aware that ViewLift does not warn you when you have chosen to link through to another website from the ViewLift Site.

ViewLift sometimes may offer content that is sponsored by or co-branded with identified third parties. By virtue of these relationships, the third parties may obtain personally identifiable information that visitors voluntarily submit to participate in the Site activity. We have no control over use of this information by these third parties.

**III. HOW WE USE THE INFORMATION WE COLLECT**

We may use the personally identifiable and non-identifiable information we collect in order to establish and enhance our relationship with you and your relationship with our partners (including our Content Providers), and to improve the user experience we provide.

ViewLift’s use of this information includes the following general purposes: customizing the content you view; responding to your inquiries about our offerings; fulfilling your requests for products, programs or services; offering products, programs or services we believe may be of interest to you; identifying any comments you post when you use the ViewLift Site; improving our services; conducting research; compiling aggregate data for business purposes; protecting our rights and other uses in accordance with our Terms of Use; and for any other purpose disclosed to you at the time we collect your information. We may combine all of the information we collect about you and use it individually or collectively in the manner described in this Privacy Policy.

By using the Site, you consent to the uses identified in this Section and any other use of information identified in this Privacy Policy. In addition, we may use the information that we collect for any other purposes disclosed to you at the time we collect your information or pursuant to your consent. We will not use or transfer personally identifiable information provided to us in ways unrelated to the ones described in this Privacy Policy without also providing you with prior notice.

**To Communicate With You.** We sometimes use your information to communicate with you, such as to notify you when we make changes to the ViewLift Site or to fulfill a request by you to receive **our newsletter(s)**. We may also use your information to provide you with promotional information about ViewLift’s features, services, and other offerings that may be of interest to you, or to provide information or offers to you that are related to the ViewLift services on behalf of our Content Providers and other business partners. You may, of course, opt out from receiving these communications at any time by contacting us at [privacy@viewlift.com](mailto:privacy@viewlift.com) or through postal mail at our address listed in this Privacy Policy.

**To Improve Our Services.** While using the Site you may have the opportunity to post comments (“User Content”). If you

choose to submit User Content for publication, we may publish your name and other information you have provided to us, such as your photo. Please understand that when you post such User Content, it is made public and is not subject to the protections of this Policy. If you remove User Content, copies may remain viewable in cached and archived pages or if other users have copied or stored your User Content.

**For Marketing.** We may use third party analytics tools such as Google AdWords, Facebook Pixel, and LinkedIn ads to track your behavior on our product. That behavioral data, combined with other behavioral data collected by those advertising platforms, may be used to target certain segments of customers based on their behavior. If the user elects to provide us with their contact information (e.g., email), we may contact that user directly using that contact information.

**For Data Analytics.** We sometimes use the non-personally identifiable information that we collect to improve the design and content of our Site and to enable us to personalize your experience. We also may use this information in the aggregate to analyze Site usage, as well as to offer you products, programs, or services.

We may use anonymous data for purposes of research or analysis. Anonymous data is information (whether it was originally personally identifiable or non-personally identifiable) that subsequently is used in aggregate form. We may conduct research on our customer demographics, Internet usage, and interests and behavior based on personally identifiable information we gather. Although anonymous data may be based in part on such personally identifiable information, it does not identify you personally. ViewLift may share this type of anonymous data with a variety of third parties, including its affiliates, advertisers and other current and prospective business partners.

We also may use anonymous data for website administration, advertising and promotional purposes, and we may share such information with various affiliated and unaffiliated entities for such purposes. IP addresses also are used to provide anonymous aggregated data to advertisers about the volume of use on the ViewLift Site. Anonymous usage and demographic information also may be shared with our advertisers and business partners.

ViewLift has implemented Google Analytics. We use the data collected by Google Analytics to better understand who our users are. ViewLift will not facilitate the merging of your personally identifiable information with the non-personally identifiable information collected from this feature.

**For Enforcement.** We may use the information that we collect to prevent illegal activities, to enforce the Site's Terms of Use, and to otherwise protect our rights and the rights of our users.

#### **IV. HOW WE SHARE THE INFORMATION WE COLLECT WITH THIRD PARTIES**

We value your privacy, and we share information about our users only under certain circumstances. We may make information about you available to other companies, applications, or people in the circumstances listed below.

**With Our Content Providers.** Periodically, we may share information, including personal data, collected from you with Content Providers who use our Site or our technology. For example, if you subscribe to a Content Provider's subscription service, we may provide your information to that Content Provider, including your name, user name, email address, and postal address. Any information you provide on our Site may also be subject to the privacy policies of these third-party Content Providers. To the extent you sign up for account with either or both of us or we share your information with a Content Provider in accordance with this privacy policy, the Content Provider's privacy policy may also apply to the use of your information. We also share de-identified information and/or aggregated information with our Content Providers, including analytics.

**With Social Networking Sites.** We may enable you to post content to Social Networking Sites (for example, Facebook, LinkedIn, Twitter, or Google+) or to log into our Site using your SNS credentials. If you choose to do this, we will provide personal information to such SNSs. You acknowledge and agree that you are solely responsible for your use of the SNSs and that it is your responsibility to review the terms of use and privacy policy of the third party provider of such SNSs. We will not be responsible or liable for the availability or accuracy of such SNSs, the content, products or services on or availability of such SNSs, or your use of any such SNSs.

**Advertisers.** We do not share personally identifiable information with advertisers, except in accordance with this policy and where you have given us permission to do so. We do share de-identified information and/or aggregated information with our

advertisers.

**For Legal Purposes.** We may disclose personally identifiable information in response to legal process, for example in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency's request, or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use, to verify or enforce compliance with the policies governing our Site and applicable laws, or as otherwise required or permitted by law or consistent with legal requirements.

**If We Sell Our Business.** As we develop our business, we have the right to buy or sell assets or business offerings. Customer, email and visitor information is generally one of the transferred business assets in these types of transactions. Accordingly, we may transfer personally identifiable information about you if we, or one of our business units, are acquired by, sold to, or merged with another company.

**With Our Agents and Contractors.** We may disclose personally identifiable information to our agents and contractors; however, they are required to protect this information in a manner that is consistent with this Privacy Policy by, for example, not using the information for any purpose other than to carry out the services they are performing for us. We currently use Amazon Web Services, Strype, MailChimp and Salesforce to provide services that require your personally identifiable information.

**Aggregated Information.** We may share aggregated information or information that does not directly identify you with third parties to help us develop content, services, and advertising that we hope you will find of interest.

**Public Activities on Site.** If you choose to engage in public activities on the site, such as posting comments, any information you submit can be read, collected, or used by others. These public activities may include posting of your name and/or user name. Please exercise caution when deciding to disclose any personal information in public activities or submissions.

## V. HOW YOU CAN CONTROL YOUR INFORMATION

At certain parts of the ViewLift Site, only persons who provide us with the requested personally identifiable information will be able to order services, view content, or otherwise participate in the relevant activities and offerings. If you have a ViewLift user account, you can email us to edit your account information, such as first and last names, company name, mailing address, telephone number, email address, and password.

**Device Preferences.** You may have choices available to you through the device or software you use to access ViewLift. For example, your mobile device may provide you with choices around how and whether location or other data is shared with us. To learn more about these choices, please see the information provided by your device or software provider.

**Cookie Preferences.** You can disable and/or delete all types of cookies, web beacons or similar technologies if permitted by your browser, installed application or Device. These technologies are generally easy to disable and/or delete but how you do so varies from browser to browser. The "help" function within your browser should tell you how to do it. Please note if you decline cookies, web beacons or other similar technologies, you may not be able to take advantage of certain Site features, services, applications, or tools. The following links also provide information on how to modify the cookies settings on some popular browsers:

Safari: <https://support.apple.com/kb/PH19214>

Firefox: <http://support.mozilla.org/en-US/kb/Deleting%20cookies>

Internet Explorer: <http://support.microsoft.com/kb/278835>

Chrome: <https://support.google.com/chrome/bin/answer.py?answer=95647>

**Google Analytics.** You may be able to opt out of Google Analytics, including the Display Advertising feature Demographics and Interest Reporting. For information on opting-out of this feature and customizing Google Display Network ads, please see <https://www.google.com/settings/ads>.

**Opt-out.** You may also contact us anytime to opt-out of: (i) direct marketing communications; (ii) automated decision-making and/or profiling; (iii) our collection of sensitive personally identifiable information; (iv) any new processing of your personally identifiable information that we may carry out beyond the original purpose; or (v) the transfer of your personally identifiable information outside the E.U. Please note that your use of some of the Site’s services may be ineffective upon opt-out.

**Access.** You may access the personally identifiable data we hold about you at any time by contacting us directly at [privacy@viewlift.com](mailto:privacy@viewlift.com).

**Amend.** You can also contact us to update or correct any inaccuracies in your personally identifiable information.

**Move.** Your personally identifiable data is portable – i.e. you to have the flexibility to move your data to other service providers as you wish.

**Erase and forget.** In certain situations, for example when the personally identifiable data we hold about you is no longer relevant or is incorrect, you can request that we erase your data.

## **VI. RETENTION AND DELETION**

We will not retain data longer than in necessary to fulfill the purposes for which it was collected, until you cancel or close your account, or as required by applicable laws or regulations. All data we collect is stored exclusively in secure hosting facilities provided by Amazon Web Services and at our offices located in the United States.

## **VII. “DO NOT TRACK” SIGNALS**

Some web browsers may transmit “do not track” signals to the websites and other online services with which the browser communicates. There is no standard that governs what, if anything, websites should do when they receive these signals. ViewLift currently does not take action in response to these signals. If and when a standard for responding is established, we may revisit our policy on responding to these signals.

## **VIII. CALIFORNIA RESIDENTS**

If you are a California resident, you may make a written request to the Site about how we’ve shared your personally identifiable information with third parties for their direct marketing purposes during the prior calendar year. Please send your request (along with your full name, email address, postal address, and the subject line labeled “Your California Privacy Rights”) by email to [privacy@viewlift.com](mailto:privacy@viewlift.com).

## **IX. OUR COMMITMENT TO SECURITY**

We believe we have in place the appropriate physical and technical procedures to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect online.

Unfortunately, no security system can be guaranteed to be 100% secure. Accordingly, we cannot guarantee the security of your information, including your personally identifiable information, and cannot assume liability for improper access to it. By using the Site, or providing information to us through any means, you do so at your own risk and you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of this site.

An important element of our safeguards to protect your personally identifiable information is verification of your identity before granting you access to your Account. You are responsible for maintaining the secrecy of your Account information, and for controlling access to your email communications from ViewLift, at all times.

## **X. AUTOMATED DECISION-MAKING AND/OR PROFILING**

We may use automated decision-making and/or profiling in regard to your personally identifiable data for some services and products, for example, automatic identification of content that we believe you’d be interested in viewing. You can request a manual review of the accuracy of an automated decision that you are unhappy with or limit or object to such automated decision-making

and/or profiling by contacting us at [privacy@viewlift.com](mailto:privacy@viewlift.com).

#### **XI. OUR COMMITMENT TO THE PRIVACY OF CHILDREN**

Protecting the privacy of young children is important to us. The Site is designed to be of interest and service to users ages 13 and older. If you are under 13 years of age, you should not use this Site. ViewLift does not knowingly collect or maintain information from persons under 13 years of age. If ViewLift learns that personally identifiable information of persons less than 13 years of age has been collected on the this Site without verified parental consent, then ViewLift will take the appropriate steps to delete this information. If you believe that we might have any information from or about a child under 13, please contact us at [privacy@viewlift.com](mailto:privacy@viewlift.com).

#### **XII. USERS OUTSIDE THE UNITED STATES**

ViewLift is a service based in the U.S., and our offices are headquartered in the U.S. All information that we collect from you or on the Site, including your personally identifiable information, is stored in the U.S., which may be outside the country in which you reside. Because end users can access our services from the E.U., we also comply with the EU's General Data Protection Regulation (GDPR). If you are accessing our services from outside of the U.S., please be aware that information you provide to us or that we obtain as a result of your use of the ViewLift services will be processed and transferred to the U.S. and be subject to U.S. law. The privacy and data protection laws in the U.S. may not be equivalent to such laws in your country of residence. By using our website, participating in any of the ViewLift services, or by providing us with your information, you consent to this collection, transfer, storage, and processing of information to and in the U.S. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy. ViewLift will delete the personally identifiable information we have collected and stored upon your request to [privacy@viewlift.com](mailto:privacy@viewlift.com).

#### **XIII. HOW TO CONTACT US**

If you have any questions or concerns about the online Privacy Policy for this Site, you may contact us at [privacy@viewlift.com](mailto:privacy@viewlift.com). You can also email us or contact us through postal mail at our address listed in this Privacy Policy anytime for any questions you may have about your personally identifiable information and our use of such personally identifiable information.

#### **XIV. UPDATES & EFFECTIVE DATE**

From time to time, we may update this Privacy Policy. We will notify you about material changes in the way we treat personally identifiable information by placing an updated Privacy Policy on our Site. We encourage you to periodically check back and review this Policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If you do not agree with any changes to the Privacy Policy, you must leave the ViewLift Site and discontinue any use of the ViewLift services. Any visit to the ViewLift Site or use of the ViewLift services by you after the new Privacy Policy is posted will indicate your agreement to the new Policy.

This Privacy Policy is made effective as of May 25, 2018.