Visible Network Labs ("VNL", "we", "our", "us") developed visiblenetworklabs.com ("Website", "Services") to help organizations solve complex problems using our comprehensive platform that provides all the tools, data and services in one place to help measure, visualize and track key relationships and connections (personal and inter-organizational). We understand how important your privacy is and will take reasonable steps to protect your information as if it was our own. This document provides our policies and procedures for collecting, using, and disclosing your information.

Information We Collect, and How We Use It

Website Visitors
To simply browse our Website, you are not required to provide any personally-identifiable information. However, we may collect non-personally-identifiable information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Visible Network Labs' purpose in collecting non-personally identifying information is to better understand how Visible Network Labs' visitors use its website and to monitor and improve our Website and Services. From time to time, we may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.

Registered Users
When you register for Aspen (or the PARTNER Tool or the Person-Centered Network App) through Visible Network Labs, we collect personal information including name, username, email, account password, account name and date of registration. We also collect potentially personally-identifying information like Internet Protocol (IP) addresses, information about your computer, geographic location, and other standard web log information. We do not disclose personally-identifying information other than as described below. Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain application or website-related activities.

We rely upon a number of legal grounds to ensure that our use of your Personal Data is compliant with applicable law. We use Personal Data to facilitate the business relationships we have with our Users, to comply with our financial regulatory and other legal obligations, and to pursue our legitimate business interests. The following list sets out the business purposes that we have identified as legitimate. In determining the content of this list, we balanced our interests against the legitimate interests and rights of the individuals whose Personal Data we process.

We:

- respond to inquiries, send service notices and provide customer support;
- promote, analyze, modify and improve our products, systems, and tools, and develop new products and services;
- analyze and advertise our products and services;
- conduct aggregate analysis and develop business intelligence tools that enable us to operate, protect, make informed decisions, and report on the performance of, our business;
- share Personal Data with third party service providers that provide services on our behalf and business partners which help us operate and improve our business (for example, a consultant who provides data visualization services for final reports);
include identifiable information for data dashboards only when a user consents to, and reviews use of that data on public facing community platforms; and
ensure network and information security through Visible Network Labs and our Services.

If we need to use your Personal Data in other ways, we will provide specific notice at the time of collection and obtain your consent where required by applicable law.

We may send you email marketing communications about Visible Network Labs products and services, invite you to participate in our events or surveys, or otherwise communicate with you for marketing purposes, provided that we do so in accordance with the consent requirements that are imposed by applicable law. When we collect your business contact details through your participation at workshops, trainings or other events, we may use the information to follow-up with you regarding an event, send you information that you have requested on our products and services and, with your permission, include you on our marketing information campaigns.

Aggregated Statistics
We may collect statistics about the behavior of visitors to the Website. However, Visible Network Labs will not disclose personally-identifying information other than as described below.

We provide aggregated statistics on networks and population health outcomes. All data are deidentified and anonymous. The purpose of this is to support communities and provide to the public good in a commons.

Cookies
A cookie is a string of information that a website stores on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns. Visible Network Labs uses cookies to help Visible Network Labs identify and track visitors, their usage of Visible Network Labs website, and their website access preferences. Visible Network Labs visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the Website, with the drawback that certain features of the Website may not function properly without the aid of cookies.

Payments
When paying for an account subscription, Visible Network Labs uses a third party payment processor, Stripe, to assist in processing your personally identifiable payment information. We do not receive or store credit card information into our servers. These transactions and Stripe's use of your personal information is governed by their privacy policy (available at stripe.com/privacy).

Where We Store Your Information
If you are located outside the United States, the information that we collect from you may be transferred to, and stored and processed at, a destination in the United States. By submitting information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy.

Disclosing Your Information

Visible Network Labs PARTNER or PCN App Public Profile
Each registered Visible Network Labs Aspen, PARTNER or PCN App user can consent to making their profile public, as a feature on the Aspen data dashboards, which may be
accessible to anyone browsing the Website. Users are given a choice of what they would like to make public, and what they want to keep private. Consent would include permission to disclose your name, username, description (if provided), location (if provided), website (if provided), avatar image (if linked to your email address or uploaded) and date of registration. Membership and use of the Connected Community Forum includes identifying yourself to other forum members who are logged in to the social network.

**Private Accounts**

Private accounts (surveys, app users, and that corresponding data) are only accessible to those that you or other managers on your account have granted access to. Visible Network Labs' employees, and members of its research teams, can access the data on our end. Users can consent to make their data results public facing, which brings added features and benefits to the users. Managers may be asked if they want to share data with their partners, clients, stakeholders, or the public. Managers can refuse, or agree at will. There are no penalties for any choice.

**Protection of Certain Personally-Identifying Information**

Visible Network Labs discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors, research partners, and affiliated organizations that (i) need to know that information in order to process it on Visible Network Labs' behalf or to provide services available at the Website or for clients, and (ii) that contractually commit to protect the security and confidentiality of Personal Data they process on our behalf. Some of those employees, contractors, research partners, and affiliated organizations may be located outside of your home country; by using Visible Network Labs, you consent to the transfer of such information to them. Visible Network Labs will not rent or sell personally-identifying information to anyone other than to its employees, contractors and affiliated organizations, as described above, Visible Network Labs discloses personally-identifying information only in response to a subpoena, court order or other governmental request, or when Visible Network Labs believes in good faith that disclosure is reasonably necessary to protect the property or rights of Visible Network Labs, third parties or the public at large. If you are a registered user of Visible Network Labs and have supplied your email address, Visible Network Labs may occasionally send you an email to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with Visible Network Labs and our services. You can opt-out of receiving these email communications from us by contacting us at privacy@visiblenetworklabs.com. If you send us a request (for example via a support email or via one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users. Visible Network Labs takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of personally-identifying information.

**Public Good Use of the Data**

By using VNL tools, you agree that your data can be included in the larger Aspen dataset. Your data are only identifiable to the VNL employees, contractors, research partners, and affiliated organizations (no organization names are made public without expressed permission, which can be given by the manager or the organization that answered the survey). Organizations may be displayed on the data dashboards as coded nodes in network maps (for example, coded as a “nonprofit organization”). All data are grouped into one large dataset that is used for network research and general knowledge on networks, and to feed into the online data dashboards. Electing to exclude your data from the larger data set does not prohibit use of the PARTNER
tool. Please notify us at privacy@visiblenetworklabs.com to discuss excluding your data from the larger dataset.\(^1\)

**Business Transfers**

If Visible Network Labs, or substantially all of its assets were acquired, or in the unlikely event that Visible Network Labs goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of Visible Network Labs may continue to use your personal information as set forth in this policy.

**Your Rights and Choices**

**Your Data Protection Rights**
Depending on your location and subject to applicable law, you may have the following rights with regard to the Personal Data we control about you:

- the right to request confirmation of whether VNL processes Personal Data relating to you, and if so, to request a copy of that Personal Data;
- the right to request that VNL rectifies or updates your Personal Data that is inaccurate, incomplete or outdated;
- the right to request that VNL erase your Personal Data in certain circumstances provided by law; and
- the right to request that VNL restrict the use of your Personal Data in certain circumstances, such as while Stripe considers another request that you have submitted (including a request that VNL make an update to your Personal Data).

Where the processing of your Personal Data is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your Personal Data on grounds relating to your particular situation.

**Communications Preferences**
We offer those who provide personal contact information a means to choose how we use the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of our marketing emails or you may send a request to privacy@visiblenetworklabs.com. Please note that if you opt-out of receiving marketing related emails from us, we may still send you important administrative messages that are required to provide you with our Services.

**Correcting, Updating and Removing Your Information**
Upon request we will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information please contact us at privacy@VisibleNetworkLabs.com. Account owners may update or change their account information by editing their profile or organization profile or by contacting support@visiblenetworklabs.com for more detailed instructions. To make a request to have personal information maintained by us returned to you or removed, please email

\(^1\) The Colorado Multiple Institute Review Board (COMIRB) approved use of the PARTNER data as a secondary data set under the Protocol #11-0098, “Assessing Partnerships in Public Health Collaboratives: Analyzing a Secondary Data Set from PARTNER (Program to Analyze, Record, and Track Networks to Enhance Relationships)”.

support@VisibleNetworkLabs.com. Requests to access, change, or remove your information will be handled within 30 days.

An individual who seeks access to, or who seeks to correct, amend, or delete inaccuracies in personal information stored or processed by us on behalf of an account owner should direct his/her query to the account owners (the data controller). Upon receipt of a request from one of our account owners for us to remove the data, we will respond to their request within thirty (30) days. We will retain personal information that we store and process on behalf of our account owners for as long as needed to provide the Services to our users. We will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

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 privacy@VisibleNetworkLabs.com.

If you are an account owner or otherwise provide us with personal information in connection with your use of our Websites or Services, we will delete this information upon your request, provided that, notwithstanding such request, this information may be retained for as long as you maintain an account for our Services, or as needed to provide you with our Services, comply with our legal obligations, resolve disputes and enforce our agreements.

Security and Retention

We make reasonable efforts to ensure a level of security appropriate to the risk associated with the processing of Personal Data. We maintain organizational, technical and administrative measures designed to protect Personal Data within our organization against unauthorized access, destruction, loss, alteration or misuse. Your Personal Data is only accessible to a limited number of personnel who need access to the information to perform their duties. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please contact us immediately. If you are a Visible Network Labs User, we retain your Personal Data as long as we are providing the Services to you. We retain Personal Data after we cease providing Services to you, even if you close your Visible Network Labs account, to the extent necessary to comply with our legal and regulatory obligations. We also retain Personal Data to comply with our tax, accounting, and financial reporting obligations. Where we retain data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

Privacy Policy Changes

Although most changes are likely to be minor, Visible Network Labs may change its Privacy Policy from time to time, and in Visible Network Labs’ sole discretion. Visible Network Labs encourages visitors to frequently check this page for any changes to its Privacy Policy. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.

Effective Date: March 9, 2018

Questions?
If you have any questions about our privacy policy, you can contact us by email at privacy@visiblenetworklabs.com or by mail using the following address:

By mail:
Visible Network Labs Inc.
Attn: Privacy
1536 Wynkoop St, Suite 913
Denver, Co 80202