

# Privacy Policy

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*Current as of January 17, 2024*

We at Libum are committed to protecting your privacy. This Privacy Policy explains how we collect and use your personal information in relation to Libum products, services, events, and websites or applications that link to this Policy (together, the “Libum Products”). It also describes how you can control or exercise your rights related to your personal information.

## 1. Responsible Libum Entity

Libum is the controller of your Personal Data and responsible for the collection, processing and disclosure of your Personal Data as described in this Privacy Policy unless expressly specified otherwise.

For detailed privacy information related to where the Libum customer is the controller, please reach out to the customer directly. We are not responsible for the privacy or data security practices of our customers, which may differ from those set forth in this Privacy Policy. Information regarding our privacy and data security practices as a processor of Personal Data on behalf of our customers can be found in the Libum Data Processing Addendum, available at <https://libum.io/legal/data/>.

## 2. What Information We Collect and Process

We process information about you while providing the Libum Products. Below, we outline the kinds of information we collect.

### Information You Give Us

We collect information about you when you provide it to us directly.

- Your Libum account. We collect information about you when you submit it through the Libum Products, including when you create an account with us. This may include your name, email address, profile picture, company name, postal address, and phone number. This may also include your payment information when you purchase any of the Libum Products.
- Support. We collect information you provide to us when you open a support request or through other communication channels such as third-party social media sites. This may include your name, email address, title, company, and any other information you provide in your request.
- Other information submitted by you. We collect information about you upon submission through Libum Products, such as when you participate in any interactive features, or fill out a form on one of our websites. We collect information about you that you submit to us through the Libum Products, such as when you participate in any interactive features of the Libum Products or fill out a form on one of our websites. This information may include your name, email address, and mailing address.

### **Information We Collect Automatically**

We automatically collect information about you when you access or use the Libum Products.

- Your use of the Libum Products. We collect information about how you use the Libum Products, such as your session date, time, and duration; the pages you viewed; and the page you visited before navigating to the products or websites.
- Device Information. We collect information about your computer or device when you access any of the Libum Products, such as the type of browser you use, your IP address, and the location of your device.
- Cookies and similar technologies. We use cookies and similar technologies (like web beacons and JavaScript) to collect information about your interactions with the Libum Products, including identifiers, usage data, session information, links clicked, and pages visited.

### Information We Collect from Other Sources

We may also obtain information about you from other sources.

- Other services linked to your account. We may collect information about you when you link your Libum account with other services. For example, if you create or log into your Libum account using your Google Apps credentials via single sign-on, we will have access to certain information such as your name and email address, as authorized in your Google Apps profile settings.
- Third parties. We may receive information about you from third parties that provide business information to us or from public sources. This information may include things like your name, title, email address, phone number, and social-media profile. We may combine this information with information we collect through other means described above.

### 3. How We Use Personal Data

We use information about you for the following purposes.

- To provide and support your use of the Libum Products. We use information about you to provide you with access to the Libum Products, including to create and manage your Libum accounts, process transactions with you, and send you invoices, as well as to provide you with customer support.
- For research and to improve the Libum Products. We use information about you, including information about your use of Libum Products, to monitor and analyze trends, usage, and other activities in connection with the Libum Products so that we can continually improve them. We may also link or combine information about you with information we get from others to help understand your needs and provide you with better service.
- To communicate with you. We use information about you to communicate with you, including to send you technical notices, product updates, security alerts, support communications, and administrative messages about the Libum Products (including important changes to the Libum

Products). This also includes sending you information about your account and data, such as when we update our terms or when we materially change how we use your data.

- For security. We use information about you to maintain and increase the security of the Libum Products, including to detect, investigate, and prevent fraud and other illegal activities from occurring, as well as to protect the rights and property of Libum, our customers, and third parties.
- To market and promote the Libum Products. We use information about you to send you promotional messages and to show you advertisements. This may also include using information about you to create more personalized advertising and suggest Libum Products that may be of interest to you.
- To comply with legal obligations. We may use information about you to comply with our legal requirements. For example, we may process and retain information about your payments to us for tax and accounting purposes.
- With your consent. Finally, we use information about you for any other purposes that you have consented to. For example, if you agree to be named as a Featured Customer, we might post information about you on one of our public websites.

#### **4. How We Share Personal Data**

We may share your personal information as follows.

- Service providers. We use third-party service providers who work on our behalf, including to provide hosting services, authentication services, and cybersecurity to improve our security posture, which may require us to share your personal information.
- For legal reasons. In rare cases, we may share information about you in response to a request for information if we believe disclosure is permitted or required by an applicable law, regulation, or legal process, including to comply with a subpoena or applicable court order. Further, we may share your personal information with any person to whom disclosure is necessary to enable us to

enforce our rights under this Privacy Policy or under any agreement we enter with you or to protect the rights, property, or safety of Libum or third parties.

- Marketing and analytics. We may share your personal information with analytics and search-engine providers that assist us in the improvement and optimization of our websites.
- Social Media. Some of our websites may contain social-sharing widgets or features that let you share information you find on our websites on third-party sites, including, for example, Twitter, LinkedIn, and YouTube. By doing so, you authorize us to facilitate this sharing of information, and you understand that the use of shared information will be governed by the social media provider's privacy notice.
- Consent. We may share your personal information with your consent or at your direction.

## 5. Security

The security of your personal information is incredibly important to us. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. All personal information is protected using appropriate physical, technical and organizational measures. For more security information at Libum, please visit <https://trust.libum.io/>.

## 6. Retention

We only keep your personal information for as long as necessary to fulfill the purposes we collected it for, after which it will be deleted or archived unless we are required to keep it to comply with our legal obligations or for another legitimate and lawful purpose. To determine the appropriate retention period for personal information, we consider several factors, including:

- the terms of our agreements with you;
- our legitimate interested (as outlined in this Privacy Policy);
- our legal obligations; and
- the nature of your personal information.

In some cases, we may anonymize your personal information so that you are no longer identifiable, in which case we may use the resulting information without further notice to you.

## 7. Your Choices

You have choices about how Libum collects and uses your personal information.

- Account information. Our customers may access, update, or change personal information they have provided to us by logging into the relevant Libum application or emailing us at [support@libum.io](mailto:support@libum.io). Subject to the terms of their agreements with us, customers may deactivate their accounts by emailing us at [support@libum.io](mailto:support@libum.io), but we may retain certain personal information as necessary to comply with our legal obligations or for legitimate business purposes, such as to resolve disputes or enforce our agreements. We may also retain cached or archived copies of personal information for a certain period.
- Advertising. You may opt out of receiving promotional emails from Libum by following the instructions in those emails or by emailing [support@libum.io](mailto:support@libum.io).

## 8. Supplemental Notice for the United States

This section provides additional details about the personal information we collect about individuals and the rights afforded to them under various applicable U.S. state data-protection and privacy laws, including the California Consumer Privacy Act, as amended (CCPA), the Colorado Privacy Act (CPA), the Connecticut Data Privacy Act (CTDPA), the Utah Consumer Privacy Act (UCPA), and the Virginia Consumer Data Protection Act (VCDPA).

## Your Rights

Subject to applicable law, you have the following rights with respect to your personal information.

- Right to access. You have the right to request that we disclose to you in a portable format the personal information we collect, use, disclose, share, and sell about you.
- Right to correct. You have the right to correct errors in your personal information.
- Right to delete. You have the right to request that we delete your personal information that we've collected.
- Right to update. You have the right to request that inaccurate personal information we hold about you be corrected.
- Right to opt out. You have the right to opt out of behavioral or targeted advertising, automated profiling, and sales of personal information.
- Right to restrict the use and disclosure of your sensitive information. You have the right to request that we limit our use and disclosure of your sensitive personal information.
- Right to nondiscrimination. You have the right not to receive discriminatory treatment because you've exercised any of your rights under the CCPA.

## Your rights related to Customer Data

As described above, we may also process Personal Data in the role of a processor (see "Responsible Libum Entity" section above). If your data has been submitted to us by a Libum customer and you wish to exercise any rights you may have under applicable data protection laws, please inquire with our customer directly. Because we may only access our customer's data upon instruction from the respective customer, if you wish to make your request directly to us, please provide the name of the Libum customer who submitted your data when you contact us. We will refer your request to that customer and will support them as needed in responding to your request within a reasonable timeframe.

If you or your authorized agent wishes to exercise any of these rights, please contact us as outlined in the “Contact Us” section below. Please note that we may ask you or your agent to provide us with additional information to confirm your identity.

If you submit a request to exercise one of the above rights and you disagree with our decision regarding your request, you may have the right to appeal our decision under applicable law. To do so, please reply to our response.

### **Categories of Personal Data Collected**

The personal information that we may have collected in the past 12 months fall into the following categories specifically established under the CCPA:

- Identifiers such as a real name, postal address, unique personal identifier, online identifier, internet protocol address, and email address.
- Information under Cal. Civ. Code §1798.80(e), such as your name, address, telephone number, or any financial information.
- Commercial information, such as information related to products or services you’ve purchased.
- Internet or other electronic network activity information, such information regarding your interaction with the Libum Products.
- Geolocation data.
- Audio, electronic, visual, or similar information, such as audio recordings of calls with you.
- Inferences drawn on the information above, such as aggregated metrics.
- Account log-in or credit card number in combination with your credentials allowing access to your account.

For more information about the categories of personal information we collect, please see the “What Information We Collect and Process” section above.



### **Categories of Personal Data Disclosed for a Business Purpose**

The personal information that we may have disclosed for a business purpose (including to our service providers) in the past 12 months fall into the following categories specifically established under the CCPA:

- Identifiers such as a real name, postal address, unique personal identifier, online identifier, internet protocol address, and email address.
- Information under Cal. Civ. Code §1798.80(e), such as your name, address, telephone number, or any financial information.
- Commercial information, such as information related to products or services you've purchased.
- Internet or other electronic network activity information, such information regarding your interaction with the Libum Products.
- Geolocation data.
- Audio, electronic, visual, or similar information, such as audio recordings of calls with you.
- Inferences drawn on the information above, such as aggregated metrics.
- Account log-in or credit card number in combination with your credentials allowing access to your account.

For more information about the categories of personal information we disclose to other parties, please see the “How We Share Personal Data” section above.

### **No Sale or Sharing of Personal Data**

We do not sell or share (for the purpose of cross-context behavioral advertising) your personal information, as those terms are defined under the CCPA.

## **9. Changes to this Privacy Policy**

We may occasionally update this Privacy Policy. The date at the top of this Privacy Policy indicates when it was last revised. The latest effective Privacy Policy can be accessed at <https://libum.io/privacy/>.

## **10. Contact Us**

If you have any questions or concerns about this Privacy Policy, please contact us at [privacy@libum.io](mailto:privacy@libum.io).