

Audere Privacy Policy

Last Update: **June 14, 2022**

BST Consultants, Inc., dba BST Global (“**BST**,” “**we**” or “**us**”), provides this privacy policy (“**Privacy Policy**”) to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive from users of our Audere website (the “**Site**”) and our services accessible via the Audere online service (an “**App**” or “**Apps**”). To make this Privacy Policy easier to read, the Site, our services and our Apps are collectively called the “**Services**.” This Privacy Policy does not apply to any third-party websites, services or applications, even if they are accessible through our Services.

SCOPE

This Privacy Policy applies to personal information processed by us in the course of our business and provision of the Services. All individuals whose responsibilities include the processing of personal information on behalf of BST Global are expected to protect that data by adherence to this Privacy Policy.

This Privacy Policy applies to all our operating divisions, subsidiaries, affiliates, and branches, and any additional subsidiary, affiliate, or branch that we may subsequently form.

I. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on whether you are a current client, prospective client, former client, customer, user, visitor, guest, partner or employee (collectively “**Individuals**”), and the requirements of applicable law.

We endeavor to collect only that information which is relevant for the purposes of processing.

Information You Provide to Us

Account Creation: When you create an account to use the Services (an “**Account**”), we collect your name, email address, username and password. You will be responsible for the confidentiality and use of your Account login and password. You are not permitted to share your Account login or password with any other person or persons. You are responsible for all activities that occur under your Account, whether or not you know about them.

Your Communications With Us: We collect personal information from you such as name, email address, job title, company name, phone number; or when you request information about our Services; register for our newsletter, marketing, event updates or promotional materials; use the Services; request customer or technical support; apply for a job; request a demo; or otherwise communicate with us.

Subscription Services: When you purchase a subscription to our Services, we may collect name, email address, phone number, job title, company name, mailing

address and payment information. For more information, see the relevant software agreement or terms of service for the Services to which you are subscribed.

Surveys: We may contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information which may include personal information.

Social Media Content: We may offer forums, blogs or social media pages. Any content you provide on these channels will be considered “public” and is not subject to privacy protections.

Registration for Sweepstakes or Contests: We may run sweepstakes and contests. Contact information you provide may be used to reach you about the sweepstakes or contest, and for other promotional, marketing and business purposes, if permitted by law. In some jurisdictions, we are required to publicly share information of winners.

Conference, Webinar & Other Events (“Event”): We collect personal information from you such as name, email address, job title or company name when you register for an event. In addition, we may attend conferences and other events where we collect personal information from individuals who interact with or express an interest in BST Global and/or the Services.

Interactive Features: We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging and chat features, commenting functionalities, forums, blogs and social media pages). Any information you provide using the public-sharing features of the Services (referred to herein as “**User Content**”) will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.

Business Development & Strategic Partnerships: We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.

Job Applications: We may post job openings and opportunities on the Services. If you reply to one of these postings by submitting your application, CV/resume and/or cover letter to us, we will collect and process the personal information contained therein to assess your suitability, aptitude, skills and qualifications for employment with BST Global.

Information Collected Automatically or From Others

Automatic Data Collection: We may collect certain information automatically when you use the Services. This personal information may include your Internet protocol (“IP”) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers; details about your browser, operating system or device, location information, and Internet service provider; pages that you visit before, during and after using the Services; information about the links you click;

and other information about how you use the Services ("**Log Data**"). Information we collect may be associated with accounts and other devices.

In addition, we may automatically collect data regarding your use of our Services, such as the types of content you interact with, and the frequency and duration of your activities. We may combine your personal information with information that other people provide when they use our Services, including information about you when they tag you.

Location Information: When your device settings allow us to do so, we may collect your precise location information to provide you with enhanced Services. If you do not want us to collect this information, you can change the settings on your device.

Cookies, Pixel Tags/Web Beacons, Analytics Information & Interest-Based

Advertising Technologies: We, as well as third parties that provide content, advertising or other functionality on the Services, may use cookies, pixel tags, local storage and other technologies ("**Technologies**") to automatically collect information through the Services. Technologies are essentially small data files placed on your computer, tablet, mobile phone or other devices that allow us and our partners to record certain pieces of information whenever you visit or interact with our Services.

- **Cookies:** Cookies are small text files placed in visitors' computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Services may not work properly.
 - Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies, if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Audere web pages you visit. You cannot decline cookies used in the App because they are necessary for App user authentication.
 - We keep track of the web pages you visit within the Site, in order to determine what portion of the Site is the most popular or most used. This data is used to deliver customized content and promotions within the Site to customers whose behavior indicates that they are interested in a particular subject area.
- **Pixel Tags/Web Beacons:** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects information about users' engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. Unlike cookies, which are stored on the user's hard drive, web beacons are typically embedded invisibly on web pages (or in an email).

Mobile Device: We collect certain information that your mobile device sends when you use our Services, like your device type, device identifier, available memory, user settings (including language/region settings and time zone), location information, mobile carrier, and the operating system of your device, as well as information about your use of our Services. Mobile versions of BST Global's Services may require

that users log in with an Account. In such cases, information about use of mobile versions of the Services may be associated with Accounts. In addition, BST Global may enable Individuals to download an application, widget, or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools may transmit personal information to BST Global to enable Individuals to access Accounts and to enable BST Global to track use of these tools. Some of these tools may enable users to email reports and other information from the tool. BST Global may use personal information or de-identified information transmitted to BST Global to enhance these tools, or to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices BST Global provides.

App: When you use our App, we may collect and store information about your location by converting your IP address into a rough geolocation, or by accessing your mobile device's GPS coordinates or coarse location if you enable location services on your device. We may use location information to improve and personalize our Services for you. If you do not want us to collect location information, you may disable that feature on your mobile device.

Analytics: We may also use Google Analytics and other service providers to collect information regarding visitor behavior and visitor demographics on our Services. For more information about Google Analytics, please visit <http://www.google.com/policies/privacy/partners/>. You can opt out of Google's collection and processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

Social Media Platforms. Our Services may contain social media buttons such as LinkedIn, Twitter and YouTube (that might include widgets such as the "share this" button or other interactive mini programs). These features may collect your IP address, which page you are visiting on our Services and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

Information From Other Sources: We may obtain personal information about you from other sources, including through third-party services and organizations to supplement personal information provided by you. For example, if you access our Services through a third-party application, such as an app store, a third-party login service or a social networking site (SNS), we may collect personal information about you from that third-party application that you have made public via your privacy settings. Personal information we collect may include your name, your SNS user identification number, your SNS username, location, sex, birth date, email, profile picture and your contacts on the SNS. This supplemental information allows us to verify information that you have provided to us and to enhance our ability to provide you with information about our business and Services.

II. HOW WE USE YOUR INFORMATION

We use your personal information for a variety of business purposes, including to:

Fulfill our contract with you and provide you with our Services, such as:

- Managing your personal information and accounts
- Providing access to certain areas, functionalities and features of our Services
- Communicating with you about your account, activities on our Services and policy changes
- Undertaking activities to verify or maintain the quality or safety of a service or device
- Processing your financial information using our third-party partners and other payment methods for products or Services purchased
- Providing advertising, analytics and marketing services
- Providing Services on behalf of our customers, such as maintaining or servicing accounts, providing customer service and verifying customer information
- Providing you with special offers, marketing and promotional materials, general information about other services, and events which we offer that are similar to those that you have already purchased or inquired about, unless you have opted not to receive such information
- Processing applications if you apply for a job we post on our Services and transactions
- Allowing you to register for events

Analyze and improve our Services pursuant to our legitimate interest and other administrative purposes, such as:

- Detecting security incidents; protecting against malicious, deceptive, fraudulent or illegal activity; and prosecuting those responsible for that activity
- Measuring interest and engagement in our Services and short-term, transient use, such as contextual customization of ads
- Undertaking research for technological development and demonstration
- Researching and developing products, services, marketing or security procedures to improve their performance, resilience, reliability or efficiency
- Improving, upgrading or enhancing our Services
- Developing new products and Services
- Ensuring internal quality control
- Verifying your identity and preventing fraud
- Debugging to identify and repair errors that impair existing intended functionality
- Enforcing our terms and policies
- Auditing relating to interactions, transactions and other compliance activities
- Complying with our legal obligations, protecting your vital interest or as may be required for the public good

Provide you with additional content and Services, such as:

- Furnishing you with customized materials about offers, products and Services that may be of interest, including new content or Services; some of the ways we market to you include email campaigns, custom audiences advertising, and “interest-based” or “personalized advertising,” including through cross-device tracking
- Provide Services that are specifically designed to be compatible and used on mobile devices

- Other purposes you consent to, are notified of or are disclosed when you provide personal information

Use De-Identified & Aggregated Information: We may use personal information and other information about you to create de-identified and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our Services, and measurement of visitors' interest in and use of various portions or features of the Services or other analyses we create.

Share Content With Friends or Colleagues: Our Services may offer various tools and functionalities. For example, we may allow you to provide information about your friends through our referral services. Our referral services may allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services.

Process Information on Behalf of Our Customers (as Processors): This Privacy Policy does not apply to any of the personal information that our customers may collect and process using BST Global's Services ("**Customer Data**"). Our customers' respective privacy policies govern their collection and use of Customer Data. Our processing of Customer Data is governed by the contracts that we have in place with our customers, not this Privacy Policy. Any questions or requests relating to Customer Data should be directed to our customer. BST Global is the controller for the personal information we process, unless otherwise stated. For information on how to contact us, please refer to "[Contact Us](#)" below.

How We Use Automatic Collection Technologies: We, as well as third parties that provide content, advertising or other functionality on the Services may use cookies, pixel tags, local storage and other technologies to automatically collect information through the Services. Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary:** We may use Technologies that are necessary to the operation of our Services. This includes Technologies that allow you access to our Services; that are required to identify irregular site behavior, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping carts, saved search or similar functions.
- **Performance Related:** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how our visitors use our Services, determine if you have interacted with our messaging, determine whether you have viewed an item or link or to improve our Services.
- **Functionality Related:** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Site or keeping track of your specified

preferences, interests or past items viewed so that we may enhance the presentation of content on our Site.

- **Advertising or Targeting Related:** We may use first-party or third-party Technologies to deliver content, including ads relevant to your interests, on our Site or on third-party sites. This includes using Technologies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as whether you have clicked on an advertisement.

Cross-Device Tracking: Your browsing activity may be tracked across different websites and different devices or apps. For example, we may attempt to match your browsing activity on your mobile device with your browsing activity on your laptop. To do this, our technology partners may share data, such as your browsing patterns, geolocation and device identifiers, and will match the information of the browser and devices that appear to be used by the same person.

III. DISCLOSING YOUR INFORMATION TO THIRD PARTIES

We disclose your information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

Aggregate Information & De-Identified Information: We may share aggregated or de-identified information that does not include personal information, and we may otherwise disclose de-identified information and Log Data with third parties for industry analysis, demographic profiling, and other purposes. Any aggregated information shared in these contexts will not contain your personal information.

Service Providers: We may share any personal information we collect about you with our third-party service providers. The categories of service providers (processors) to whom we entrust personal information include: information technology and related services, information and services, payment processors, customer service providers, and vendors to support the provision of the Services.

Business Partners: We may provide personal information to business partners with whom we jointly offer products or services. In such cases, our business partner's name will appear along with ours.

Affiliates: We may share personal information with our affiliated companies for our administrative purposes, including activities such as IT management, for them to provide services to you, or support and supplement the Services we provide.

Other Users/Website Visitors: As described above in "[Personal Information We Collect](#)," our Services allow you to share your profile and/or User Content with other users publicly, including to those who do not use our Services.

Advertising Partners: Through our Services, we may allow third-party advertising partners to set Technologies and other tracking tools to collect personal information regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited,

location, time of day). We may also combine and share such information and other information (such as demographic information and past purchase history) with third-party advertising partners. These advertising partners may use this personal information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third-party websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising.” We may allow access to other data collected by the Services to share information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer not to share your personal Information with third-party advertising partners, you may follow the instructions as set forth below.

APIs/SDKs: We may use third-party Application Program Interfaces (“APIs”) and Software Development Kits (“SDKs”) as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in “[Contact Us](#)” below.

Disclosures to Protect Us or Others: We may access, preserve and disclose any personal information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: Comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our or others’ rights, property or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

Disclosure in the Event of Merger, Sale or Other Asset Transfers: If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, then your personal information may be sold or transferred as part of such a transaction, as permitted by law and/or contract. In such event, BST Global will endeavor to direct the transferee to use personal information in a manner that is consistent with the Privacy Policy in effect at the time such personal information was collected.

International Data Transfers: All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

IV. YOUR CHOICES

General: You have certain choices about your personal information. Where you have consented to the processing of your personal information, you may withdraw that consent at any time and prevent further processing by contacting us as set forth in “[Contact Us](#)” below. Even if you opt out, we may still collect and use non-personal information regarding your activities on our Services and for other legal purposes as described above.

Email & Telephone Communications: If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding updates to the Services or this Privacy Policy).

We maintain telephone “do-not-call” and “do-not-mail” lists as mandated by law. We process requests to be placed on do-not-mail, do-not-phone and do-not-contact lists as required by applicable law.

Text Messages: You may opt out of receiving text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us.

Mobile Devices: We may send you push notifications through our mobile applications with notices that may be of interest to you. You may at any time opt out from receiving these types of communications by changing the settings on your mobile device. We may also collect precise location-based information if you use our mobile applications. You may opt out of this collection by changing the settings on your mobile device.

“Do Not Track”: Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

Cookies & Interest-Based Advertising: You may stop or restrict the placement of Technologies on your devices or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#) and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these, and learn more about targeted advertising and consumer choice and privacy at [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights: In accordance with applicable laws, you may have the right to:

- **Access Personal Information** about you, including: (i) confirming whether we are processing your personal information, and (ii) obtaining access to or a copy of your personal information

- **Request Correction** of your personal information where it is inaccurate, incomplete or outdated; in some cases, we may provide self-service tools that enable you to update your personal information
- **Request Deletion, Anonymization or Blocking** of your personal information when processing is based on your consent or when processing is unnecessary, excessive or noncompliant
- **Request Restriction of or Object to** our processing of your personal information when processing is noncompliant
- **Withdraw Your Consent** to our processing of your personal information; if you refrain from providing personal information or withdraw your consent to processing, some features of our Service may not be available
- **Request Data Portability** and receive an electronic copy of personal information that you have provided to us
- **Be Informed** about third parties with which your personal information has been shared
- **Request the Review** of decisions taken exclusively based on automated processing if that could affect data subject rights

If you would like to exercise any of these rights, please contact us as set forth in "[Contact Us](#)" below. We will process such requests in accordance with applicable laws.

V. DATA RETENTION

We store the personal information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws. When a trial ends or is canceled, all data will be removed within 30 days. When a subscription ends or is canceled, all data will be removed within 60 days.

VI. SECURITY OF YOUR INFORMATION

We take steps to ensure that your personal information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any personal information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unintentional disclosure.

By using the Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Services, by mail or by sending an email to you.

VII. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

This Supplemental California Privacy Notice only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 ("CCPA"). The CCPA provides California residents with the right to know what categories of personal information BST Global has collected about them and whether BST Global disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information below:

Category	Examples	Category of Third-Parties' Information Is Disclosed to for a Business Purpose
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name or other similar identifiers.	• Internet Service Providers • Service Providers
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, address, telephone number, bank account number, credit card number, debit card number or any other financial information,	• Internet Service Providers • Service Providers
F. Internet or other electronic network activity	Browsing history, search history, and information on a consumer's interaction with an internet website, application or advertisement.	• Service Providers
H. Sensory data	Audio, electronic, visual, thermal, olfactory or similar information.	• Service Providers
K. Inferences drawn from other personal information to create a profile about a consumer	Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth in "[Personal Information We Collect](#)" and "[How We Use Your Information](#)" above, respectively.

"Sales" of Personal Information Under the CCPA: For purposes of the CCPA, BST Global does not "sell" personal information, nor do we have actual knowledge of any "sale" of personal information of minors under 16 years of age.

Additional Privacy Rights for California Residents

Non-Discrimination: California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

Authorized Agent: Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, please contact us as set forth in "[Contact Us](#)" below, and provide written authorization signed by you and your designated agent.

Verification: To protect your privacy, we will take the following steps to verify your identity before fulfilling your request. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include asking you to answer questions regarding your account and use of our Services.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in "[Contact Us](#)" below. We will process such requests in accordance with applicable laws.

Accessibility: This Privacy Policy uses industry-standard technologies and was developed in line with the World Wide Web Consortium's Web Content Accessibility Guidelines, version 2.1. If you wish to print this policy, please do so from your web browser or by saving the page as a PDF.

California Shine the Light: The California "Shine the Light" law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

Right for Minors to Remove Posted Content: Where required by law, California residents under the age of 18 may request to have their posted content or information removed from the publicly viewable portions of the Services by contacting us as set forth in "[Contact Us](#)" below, or by logging into their Account and removing the content or information using our self-service tools.

VIII. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

If you are a resident of Nevada, you have the right to opt out of the sale of certain personal information to third parties who intend to license or sell that personal information. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you would like to request that we not sell your information in the future, please contact us as set forth in "[Contact Us](#)" below via email with the subject line "Nevada Do Not Sell Request," and provide us with your name and the email address associated with your account.

IX. CHILDREN'S INFORMATION

The Services are not directed to children under 17 (or other age as required by local law), and we do not knowingly collect personal information from children. If you learn that your child has provided us with personal information without your consent, you may contact us as set forth in "[Contact Us](#)" below. If we learn that we have collected any personal information in violation of applicable law, we will promptly take steps to delete such personal information and terminate the child's account.

X. OTHER PROVISIONS

Supervisory Authority: If you are located in the European Economic Area or the UK, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

Changes to Our Privacy Policy: We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you use the Services after the new Privacy Policy is posted on the Services.

XI. CONTACT US

If you have any questions about our privacy practices or this Privacy Policy, or if you wish to submit a request to exercise your rights, please contact us at:

For General Questions:

- Mailing Address
BST Consultants, Inc. (dba BST Global)
Audere a division of BST Global
5925 Benjamin Center Drive, Suite 110
Tampa, FL 33634, USA
- Email Address: hello@audere.com

To Submit a Request to Exercise One of Your Rights:

- Email Address: hello@audere.com; When you submit the email, please include your full name, email address associated with your Account and a detailed description of your request