

## IdeaSoil, LLC Privacy Policy

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IdeaSoil, LLC  
commARCH is a division of IdeaSoil, LLC  
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**IdeaSoil, LLC**, is focused on providing its audiences with the content they most desire in the formats they prefer. That requires us to gather an assortment of information that will be used to achieve that primary objective. In doing so, we do not want to violate trust between parties. As a result, we do not sell your personal information and only utilize it for a continually improving content experience. IdeaSoil, LLC's Privacy Policy is no different than its values of accessibility, equity, continual evolution, and fresh thinking.

By using this IdeaSoil site, you agree to the terms of this policy. While it is current as of its effective date, it will continue to evolve so please check this area for updates.

To consume certain features of the website and associated subscriptions, you will be asked to provide personal/professional information. It is always voluntary.

IdeaSoil, LLC, is operated from the U.S (United States) (United States). If you are visiting the Website from outside the U.S, you agree to any processing of any personal information you provide us according to this policy.

### **ADVERTISING SUPPORTED JOURNALISM**

The primary revenue stream for commARCH is advertising. Research and analytics demonstrate the correct advertising, delivered at the right time, is of equal value as the rest of the website content. As a result, IdeaSoil, LLC offers limited advertising spots filled by companies of the highest interest to each user's information needs. To achieve this requirement, IdeaSoil tracks subscriber information behaviors to ensure all information delivered on commARCH is of the highest value. This specific individual information is never shared or sold to 3<sup>rd</sup> parties unless it is specific to generalized tracking and analytics. 3<sup>rd</sup> parties only gain access to your attention through the commARCH platforms.

### **NON-ADVERTISING SUPPORTED JOURNALISM**

Information created for specific audiences will at times be available at a small charge. This information is never sold or provided to 3<sup>rd</sup> parties unless it is clearly stated as such. Traditionally this is sponsored content that is considered "lead-gen" by the sponsors and IdeaSoil, LLC.

### **COPYRIGHT POLICY**

All materials contained on this website (including text, content, photographs, video, and audio) are protected by United States copyright law and may not be reproduced, distributed, transmitted, displayed, published, broadcast, or modified in any way without the prior written consent of IdeaSoil, LLC, or in the case of third-party materials, the owner of that content. You may not alter or remove any trademark, copyright, or other notice from copies of this content.

## TRADEMARKS

The IdeaSoil, LLC name and logo, and all related names, logos, product and service names, designs and slogans are service marks or trademarks of IdeaSoil, LLC. They may not be used or displayed without prior written consent. All other trademarks, product names and company names and logos appearing on the Sites are used for identification purposes only and may be the trademarks of their respective owners.

## COPYRIGHT COMPLAINTS

We respect the intellectual property of others, and we ask our users to do the same. If you believe that your work has been copied and is accessible on a Site in a way that constitutes copyright infringement, you may notify us by providing: 1. an electronic or physical signature of the person authorized to act on behalf of the owner of the copyright interest; 2. a description of the copyrighted work that you claim has been infringed; 3. identification of the URL or other specific location on the Site where the material that you claim is infringing is located; 4. your address, telephone number, and e-mail address; 5. a statement by you that you have a good faith belief that the disputed use is not authorized by the copyright owner, its agent, or the law; 6. a statement by you, made under penalty of perjury, that the above information in your notice is accurate and that you are the copyright owner or authorized to act on the copyright owner's behalf. Please send any complaints to [Info@IdeaSoil.com](mailto:Info@IdeaSoil.com).

## WHAT DATA ARE WE COLLECTING?

Anything that provides IdeaSoil, LLC with the ability to produce more meaningful experiences for its users and subscribers. Subscription information, research, registration for education programs and premium content offerings as well as Internet Protocol addresses, browser type/language, and a timestamp for the request.

We receive certain Personal Data directly from you when you provide us with such Personal Data, including without limitation the following: First name, Last name, Email address, Mailing address, Telephone number, Country, Job Title, etc.

For analytics platforms like Google Analytics: anonymous (ad serving domains, browser type, demographics, language settings, page views, time/date), pseudonymous (IP address).

Through social buttons provided by services like Twitter, Google+, LinkedIn and Facebook. Your use of these third-party services is entirely optional. We are not responsible for the privacy policies and/or practices of these third-party services, and you are responsible for reading and understanding those third-party services' privacy policies. We receive information about you from some of our service providers (e.g., LinkedIn) who assist us with marketing or promotional services related to how you interact with our websites, applications, products, services, advertisements, or communications. We process this Personal Data based on our legitimate business interest in providing direct marketing about our products and services.

These Sites are not intended for **children under the age of 16**. If you are under 16, please do not attempt to register for the Services or send any Personal Data about yourself to us. We will not knowingly collect personal information from Site visitors in this age group. We encourage parents to talk to their children about their use of the Internet and the information they disclose online. If a child has provided us with personal information, a parent or guardian of that child may contact us via e-mail at

the above e-mail address if they would like this information deleted from our records. We will use reasonable efforts to delete the child's information from our databases.

IdeaSoil, LLC retains Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide the Services to you and improve the Services for all users.

We seek to protect Personal Data using appropriate technical and organizational measures based on the type of Personal Data and applicable processing activity.

## COOKIES?

**Essential Cookies.** Essential cookies are required for providing you with the features or services that you have requested. For example, certain cookies enable you to log into secure areas of our Site. Disabling these cookies may make certain features and services unavailable. **Functionality Cookies.** Functional cookies are used to record your choices and settings regarding our Services, maintain your preferences over time, and recognize you when you return to our Services. These cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region). **Performance/Analytical Cookies.** Performance/analytical cookies allow us to understand how visitors use our Site and Services such as by collecting information about the number of visitors to the Site, what pages visitors view on our Site, and how long visitors are viewing pages on the Site. Performance/analytical cookies also help us measure the performance of our advertising campaigns to help us improve our campaigns and the Services' content for those who engage with our advertising. **Retargeting/Advertising Cookies.** Retargeting/advertising cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. Most browsers automatically accept cookies but have an option for blocking or deleting cookies, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new cookie in a variety of ways. You can usually access these options through the "Settings" or similar menu in your browser. For more information about cookies, including how to see what cookies have been set and how to manage and delete cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note that if you block or delete cookies, some portions of the Services may not work properly. In some cases, cookies may enable us to aggregate certain information with other Personal Data we collect and hold about you.

## WHAT DATA ARE WE SHARING?

This is a relationship built on trust. We look after your privacy.

Unless aligned with an offer such as education material, contests, or specifically sponsored content, we do not share your personal information with third parties.

We employ and contract with people and other entities that perform certain tasks on our behalf and who are under our control (our "Agents"). We may need to share personal information with our Agents to provide products or services to you. Unless we tell you differently, our Agents do not have any right to use Personal Information or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of Personal Information with our Agents. We may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or all our assets, were acquired, or if we go out of business or enter 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 us or our assets may continue to use your personal information as set forth in this policy.

IdeaSoil, LLC may contact you, by email or other means. For example, IdeaSoil, LLC may send you promotional emails relating to IdeaSoil, LLC or other third parties IdeaSoil, LLC feels you would be interested in, or communicate with you about your use of the IdeaSoil, LLC website. IdeaSoil, LLC may also use technology to alert us via a confirmation email when you open an email from us. You can modify your email notification preferences by clicking the appropriate link included in the footer of email notifications. If you do not want to receive email from IdeaSoil, LLC, please opt out of receiving emails at the bottom of any IdeaSoil, LLC emails.

### **IdeaSoil, LLC GDPR (General Data Protection Regulation) Privacy Notice**

For this GDPR Privacy Notice, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” means information that can be used to individually identify a person, and “processing” covers actions that can be performed in connection with data, such as collection, use, storage, and disclosure. IdeaSoil, LLC, Inc. (“IdeaSoil, LLC”) will be the controller of your Personal Data processed in connection with the Services, except that we may also process Personal Data of our customers’ end users or employees in connection with our provision of services to such customers, in which case we are the processor of Personal Data and the customer is the controller. For more information about your data rights and processing activities where we are the controller, please contact us at [info@IdeaSoil.com](mailto:info@IdeaSoil.com).

Where applicable, this GDPR Privacy Notice is intended to supplement, and not replace, our existing privacy policy). If there are any conflicts between this GDPR Privacy Notice and our Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this notice or whether any of the following applies to you, please contact us at [info@IdeaSoil.com](mailto:info@IdeaSoil.com).

Furthermore, if we choose to buy or sell assets, user information is typically one of the transferred business assets. Moreover, if we, or all our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third-party, and we would share Personal Data with the party that is acquiring our assets based on our legitimate business interest of being able to provide you with continued services. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

### **YOUR RIGHTS REGARDING PERSONAL DATA?**

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email [info@IdeaSoil.com](mailto:info@IdeaSoil.com). Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary, to verify your identity and the nature of your request. **Access:** You can request more information about the

Personal Data we hold about you and request a copy of such Personal Data. You can also access certain of your Personal Data by emailing us at [info@IdeaSoil.com](mailto:info@IdeaSoil.com).

**Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement Personal Data by emailing us at [info@IdeaSoil.com](mailto:info@IdeaSoil.com).

**Erasure:** You can request that we erase some or all your Personal Data from our systems.

**Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all our Services.

**Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.

**Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.

**Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.

**Right to File Complaint:** You have the right to lodge a complaint about our practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

## ONLINE PURCHASES

All purchases are governed by the Terms of Sale specified in the Site, which are hereby incorporated by reference.

## SUBMISSIONS

All communications or materials that you send for use by IdeaSoil, LLC or its advertisers or business partners, through a Site, by electronic mail or otherwise (except as User Content submitted for display on a publicly available portion of the Sites), including without limitation any comments, data, materials, techniques, questions, suggestions, proposals, ideas, copyrightable subject matter, or the like ("Submissions"), are and will become the property of IdeaSoil, LLC. You agree that all intellectual property rights in and to your Submissions are transferred to IdeaSoil, LLC and that you give up any claim that any use of the Submissions violates any of your rights including moral rights, privacy rights, proprietary or other property rights, publicity rights, rights to credit for material or ideas, or any other right, including the right to approve the way we use such Submissions. Any Submissions may be adapted, broadcast, changed, copied, disclosed, licensed, performed, posted, published, sold, transmitted, or used by us anywhere in the world, in any medium, forever. Furthermore, we are free to use, without any compensation to you, any concepts, ideas, knowledge, or techniques contained in any communication you send to a Site for any purpose whatsoever, including but not limited to developing, manufacturing, and marketing products using such information. However, you understand and agree that we are not obligated to use any such Submissions and you have no rights to compel such use.

## TERMINATION

IdeaSoil, LLC may terminate your access or suspend any user's access to all or part of any Site, without notice, for any conduct that we, in our sole discretion, believe is in violation of any applicable law or is harmful to the interests of another user, a third-party provider, a service provider, or us.