

PRIVACY POLICY

Last Updated: August 14, 2021

Thank you for your interest in Firsthand, an affiliate of Infobase Holdings, Inc. (referred to as “**Firsthand**”, “**we**”, “**us**” or “**our**”). Your privacy is important to us, and this Privacy Policy describes how we process personal information as part of our business operations, including the types of personal information that we collect, the purposes for which we use it, the types of third parties to whom we share it, and the rights and responsibilities you may have with respect to such personal information. This Privacy Policy applies to the personal information you provide to us through any type of engagement or interaction, such as when you access or use our Site or any of our Services. For purposes of this Privacy Policy, the Site and Services are collectively referred to as the “**Online Services**”. By accessing or using the Online Services or by otherwise providing us with personal information, you are consenting and agreeing to the terms and conditions set forth in this Privacy Policy.

DISCLAIMER. BY USING THE ONLINE SERVICES YOU MAY HAVE THE ABILITY TO PROVIDE YOUR RESUME AND OTHER PERSONAL INFORMATION TO THIRD PARTY ALUMNI MENTORS, UNAFFILIATED ADVISORS, AND EMPLOYEE RECRUITERS AND WE ARE NOT RESPONSIBLE FOR HOW SUCH A THIRD PARTY MAY COLLECT, USE, OR PROCESS YOUR PERSONAL INFORMATION. IF YOU RETAINED THESE SERVICES THROUGH A THIRD PARTY, SUCH AS YOUR EMPLOYER OR UNIVERSITY, PLEASE CONTACT THE APPLICABLE THIRD PARTY DIRECTLY ABOUT EXERCISING YOUR DATA PRIVACY RIGHTS.

1. DEFINITIONS

For purposes of this Privacy Policy, the term “**personal information**” refers to any information that, either alone or in conjunction with other data, can be used to distinguish or identify a particular individual, household, or device, and that is subject to, or otherwise afforded protection under, a law, statute, or regulation governing data privacy or security.

Any capitalized term that is not otherwise defined herein, shall be ascribed the meaning set forth in the **Terms of Service**.

2. THE TYPES OF PERSONAL INFORMATION WE COLLECT

The type and categories of personal information that Firsthand collects varies based on the nature and scope of our business activities. However, when you do not provide personal information that Firsthand requests, we may not be able to provide you our services or complete a transaction, and you agree that Firsthand will not be liable or otherwise responsible for any damages or loss arising from such circumstances. Generally, we collect the following types and categories of personal information from users of our Online Services or as part of our business operations:

The Personal Information We Collect	
Category	Description
Identity and Contact Data	Basic data that is used to identify or contact an individual, such as your name, title, email address, telephone and fax numbers, physical address (including street, city, state, postal code, and/or country), and date of birth.
Resume Data	Your resume, curriculum vitae, or similar information related to your professional experiences, which may include your Identity Data; current and former employment/employer; Education Data (see below); awards and recognitions; language proficiency; memberships and associations; references; publications;

	volunteer work; career goals; and, professional skills and similar types of data.
Education Data	Information pertaining to your education, including level of education completed; schools and universities attended; degrees and certifications obtained; dates of graduation or completion; grades and grade point average; transcripts; attendance records; courses taken; sanctions or other disciplinary record; awards and honors; and, similar types of data.
Users Accounts	When you set up an account within our Online Services, you may create a profile (“ Profile ”) that will include your username and password, and the personal information you upload to it, such as any Resume Data and Education Data
Advisor Data	Professional and biographical information about the Advisors who agree to provide career counseling and similar services to Advisees.
Business Contact Data	Information related to other employees, owners, directors, officers, or contractors of a third party organization with whom we may conduct, or possibly conduct, business activities.
Marketing Data	Data about your marketing and communications preferences.
Transaction Data	Data about the Services you have purchased from us, including your specific orders; details of payments made to and from you; and your purchase history and preferences. Firsthand uses a third party service provider to collect and process all payment card data and Firsthand does NOT collect or store any payment card numbers.
Feedback	Your feedback about the Online Services and any of our other products or offerings, which include data gathered from questionnaires in which you voluntarily complete.
Survey Data	Your responses to the surveys in which you participate. In the event you participate in our professional and employer surveys, some questions therein may be mandatory and you cannot complete the survey without furnishing some personal information.
Correspondence Data	Records and copies of your correspondence with us.
Demographic and Sensitive Information	We may collect demographic details, including special categories of data, such as data related to gender and race. Firsthand uses this demographic information to analyze the survey participants and, at times, to compare results among different groups of participants. All demographic questions are purely voluntary, and participants will not be penalized for not answering such questions.
Technical Data	See below.

Technical Data

In addition to the foregoing, when you use the Online Services, we collect and use additional data and tools, including usage data, metadata, location data, and cookies and tracking technologies (collectively, “**Technical Data**”), which is described below. The Online Services collect Technical Data on a consistent and reoccurring basis, unless your device settings are updated to prevent such collection. We use this Technical Data in accordance with the terms and disclosures set forth in this Privacy Policy.

Usage Data. When you access and use the Online Services, we may automatically collect details of your access to and use of the Online Services, including traffic data, usage logs, and other communication data, and the resources that you access and use on or through the Online Services (e.g., browsing history, search history). We may also collect information about your device and internet connection, including the device’s unique device identifier (e.g., device

type, IMEI, Wi-Fi MAC, IP address), operating system, browser type, and mobile network information. The Online Services may collect diagnostic-related data related to your use of the Online Services, such as crash data and logs, performance data (e.g., launch time, hang rate, or energy use), and any other data collected for the purposes of measuring technical diagnostics.

Metadata and Device Access. The Online Services may access metadata and other information associated with files stored on your device, such as photographs, audio and video clips, personal contacts, and address book information.

Location Data. When you access and use the Online Services, we may collect information and data identifying the precise, real-time location of the device that is used to access or use the Online Services. You can choose whether or not to allow the Online Services to collect and use information about your device's location. If you block the use of location information, some parts of the Online Services may become inaccessible or not function properly.

Cookies and Tracking Technologies. We use cookies and other tracking technologies within the Online Services. A cookie is a small file placed on your smartphone or other device. It may be possible to refuse to accept cookies by activating the appropriate setting on your smartphone or device. However, if you select this setting, some parts of the Online Services may become inaccessible or not function properly. In addition, the Online Services may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us to analyze data on the users of the Online Services (e.g., recording the popularity of certain content and verifying system and server integrity). The Online Services may collect data about the advertisements you have seen or engaged. For more information, see our [Cookies Policy](#).

3. VIDEO TELECONFERENCING

Firsthand hosts and uses video teleconferencing (“VTC”) platforms to facilitate certain aspects of our Services (e.g., mentoring sessions, career fairs), and to host conferences, meetings, training events. These VTC platforms may be owned and administered by a third party service provider (e.g., Zoom, WebEx, Skype for Business). Please be aware that the VTC platforms may record the content, conversations, and discussions thereon, and such records may be stored or retained by our third party service providers. By participating in the VTC platforms, you hereby consent to the collection and retention of any information and content provided therein, and hereby consent to the recording of such activities. Notwithstanding the foregoing, each Advisor hereby acknowledges and agrees that Advisor (i) shall not record mentoring sessions or any content therein, or retain any communications or content therefrom, unless Advisor obtains advanced written approval and consent of each and every party, including the Advisee, participating in the mentoring session and (ii) that the foregoing approval and consent is completely voluntarily and Advisor shall not alter or change the mentoring session in the event such approval and consent is withheld.

4. HOW WE COLLECT PERSONAL INFORMATION/SOURCES

Firsthand obtains your personal information directly from you when you provide it to us (i.e., direct collection) and from third parties (i.e., indirect collection), which includes the following:

Direct Collection. We often collect personal information directly from you when you undertake the following activities: use or access our Services; complete one of our web forms; contact our customer service centers or request information from us in any other way; visit one of our locations or premises; submit an order or make a purchase with us; provide us contact information via a business card or through similar communications; complete a survey or otherwise provide us feedback; report product/service issues; communicate with us via social networking websites, third party applications, or similar technologies; and/or visit, one of our trade counters at an exhibition.

Indirect Collection. We may collect personal information about you from third parties, which we may combine with other information we already retain in order to provide the Online Services or promote our legal or business interests. For example, Institutions that partner with Firsthand may provide personal information to us so we can create user accounts for their students. In addition, employers may provide us with personal information and other background data on their job applicants so we can assist with their employment recruitment process. If you provide personal

information about a third party, then you expressly represent and warrant to Firsthand that you have the full right and lawful authority to provide Firsthand with the information.

5. HOW WE USE YOUR INFORMATION

We use, process and retain your personal information to provide the Online Services, and to promote and defend our business interests. This includes:

- Providing and administering the Online Services, including executing transactions and enabling you to access the services therein.
- Delivering to you notice about job opportunities and communications from potential employers.
- Analyzing your use of the Online Services to personalize them to you (e.g., suggest employers to you based on your Resume Data).
- Contacting you directly and providing you information about the Online Services or on our other products or offerings and answering service requests.
- Tracking and updating your orders and invoices.
- Furnishing you technical notices and security alerts, and support and administrative messages.
- Performing analyses that help us to develop and improve the quality of our Online Services, and other products, and offerings.
- Furnishing you questionnaires and conducting research and analysis to help us better understand your purchasing preferences, identify the products and services that best meet your requirements, measuring the effectiveness of our advertising and marketing, or to otherwise improve our business.
- Enforcing security and legal requirements, such as detecting, preventing and responding to fraud, intellectual property infringement, violations of our **Terms of Service**, violations of law or other misuse of our Online Services, products, or facilities.
- Administering and protecting our business and our Online Services, including system maintenance, support, reporting and hosting of data.
- Protecting the health and safety of our employees, contractors, customers, and others in our community.
- Promoting, defending or protecting our legal, regulatory, or business interests, including enforcing contracts and other agreements.
- In any other way with your consent.

Survey Data

In important part of our Services is to undertake professional surveys to better understand employer and employee needs, capabilities, and business models and develop ratings for certain types of categories related thereto. In the event you participate in such a survey, we will use the information derived therefrom for the following purposes:

Employer Profiles. As part of our Employer Profile surveys, you have an opportunity to provide us feedback about your workplace experience with a particular employer. Our editors consolidate, review, and analyze your feedback (and the survey results of other participants) and write a summary of these experiences within an Employer Profile on our Site. Firsthand editors may also select quotes from within your survey feedback to include as part of an Employer Profile. Please be aware that Employer Profiles, including your feedback therein, may be published to the general public and therefore you should avoid including in your feedback any personal information or other details that might compromise your own anonymity or that of any other individual.

Employee/Intern Reviews. For our Employee/Intern Review surveys, you have an opportunity to provide us feedback about your workplace experience with a particular employer and your feedback may be published within an Employer Review on our Site. Your feedback may be posted without any editorial review by us. In addition, you may register with Firsthand in order to submit reviews, insights, and opinions about your current or former employers or schools. In either case, while your name is not associated with a quotation or review, the review may be accompanied by general identifiers, where provided, such as office location, position/level, department, or year in which the survey

was conducted. The review also identifies whether you are a “verified employee” or “verified intern” to indicate that the comment was collected through Firsthand’s survey process and distinguish it from other user-generated reviews.

Blog Posts, Career Advice, and Other Forums. Firsthand may use anonymous comments and/or aggregated scores provided to our surveys for the purposes of publishing blog posts or articles; making presentations; or participating in public or private forums or other discussions on employee satisfaction, perceptions of employers, and industry trends.

Research Reports. Firsthand may use aggregated and de-identified data from our surveys for the purposes of client research, to help employers benchmark employers against the industry and their peers and/or to gauge relative levels of satisfaction among their own employees. In the event these research reports include the survey’s text feedback, Firsthand reviews and edits, as necessary, such feedback to seek to minimize the personal information associated with your comments. However, you should be aware that their comments may be published or used for research and avoid including details that might compromise their anonymity.

6. SHARING YOUR PERSONAL INFORMATION WITH OTHERS

We do not sell, lease, or rent your personal information to a third party for profit or other valuable consideration. We may, however, share your personal information with selected third parties for our business purposes, including as set forth in this Privacy Policy. In addition, we may also share your personal information as follows:

Corporate Group Sharing. We share personal information to our parent company, Infobase Holdings Inc., and among our affiliates and subsidiaries who act for Firsthand or on behalf of our parent company and these recipients may use your personal information in accordance with the terms and conditions of this Privacy Policy (e.g., marketing, surveys) or their own data privacy representations. In addition to the foregoing, Firsthand may leverage computer networks and systems of our parent company, affiliates, and subsidiaries and the personal information may be transmitted or retained thereon. For information about our parent company, visit <https://www.infobase.com/about/>.

Service Providers. We share information, including personal information, with our third party service providers that assist us in providing our Online Services, application development, service delivery, backup, storage, payment processing, analytics, and other services for us. These third party service providers may have access to or process your personal information for the purpose of providing these services for us. We may collect, and we may engage third party analytics providers to collect, metrics and information regarding your use of the Online Services to improve existing features or inform sales and marketing strategies, based on our legitimate interest to improve the Online Services.

Advisors and Third Party Employers. As part of the Services, we may share your personal information with advisors and employers with whom you may seek to engage for advice and consultation or we believe satisfy your employment or consulting needs or requirements.

Business Partners. In addition, we may share data with trusted partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide customer support. We may partner with trusted third parties to provide you with co-marketing content that we think may be relevant to you. We may also share your personal information with our third party professional advisors and consultants (e.g., outside counsel, tax advisors).

Corporate Restructuring. If we (or our assets) are acquired by another legal entity, whether by merger, acquisition, bankruptcy or otherwise, that legal entity would receive all information gathered by Firsthand via the Online Services, including your personal information retained thereon. To the extent practicable, we will notify you of any such change in corporate ownership by posting a notice on the Site or taking similar actions.

Compelled Disclosure. We will use or disclose your personal information if required by law, statute, or regulation, or judicial or administrative order or decree, or any other demand submitted by a government, regulatory, or judicial entity that has the force and effect of law.

Business Interests. We reserve the right to use and disclose your personal information to a third party if we reasonably believe that use or disclosure will protect our rights or your safety or the safety of others.

Privacy Policy. This Privacy Policy may describe other circumstances in which Firsthand shares personal information with third parties, and such descriptions shall not limit the categories of sharing set forth in this Section 6 of the Privacy Policy and the personal information descriptions set forth in this Section 6 shall not limit Firsthand's ability to share personal information as set forth elsewhere in this Privacy Policy.

In the event that you facilitate a transaction with Firsthand, or request information from, or otherwise engage with us, and such activities require Firsthand (in our sole judgment) to share your personal information with a service provider or other third party, you hereby consent to the same and acknowledge and agree that any such third party information sharing is being undertaken at your direction.

7. THIRD PARTY LINKS, SINGLE SIGN ON (SSO)

Firsthand may include in the Online Services certain links to other websites, including websites operated by unaffiliated third parties. Each such third party website has its own privacy policies and practices, which may be different than the policies and practices described herein; we urge you to read any privacy policy posted on a third party website carefully as such third party privacy policy (and not this Privacy Policy) controls with respect to the collection, use, and processing of your personal information thereon. Additionally, to the extent that you follow a link to a website operated by an independent third party, please be aware that Firsthand exercises no authority or control over that third party and we cannot be, and are not, responsible for any information that you may submit at that website or how it is used.

You may log into our Online Services through or from a third party social media or authentication service (e.g., Facebook, LinkedIn, Google). These sign-on services will authenticate your identity and provide you access to our Services, provide you with the option to share certain personal information (e.g., name, email address, profile picture, location) with us, and pre-populate our forms or other parts of our Services with the personal information already retained by the third party. You should verify your privacy settings on these third party services to understand and determine the types of personal information sent to us.

8. THIRD PARTY COLLECTION AND TRACKING

When you access the Online Services, certain third parties may use automatic information collection technologies to collect information about you or your device that is used to access the Online Services. These third parties may include advertisers, ad networks, and ad servers; analytics companies; your mobile device manufacturer, and your mobile service provider. They may collect personal information about your online activities over time and across different websites, apps, and other websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control the tracking technologies employed by third parties or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

9. DATA RETENTION AND LOCALIZATION

The time period in which Firsthand retains your personal information varies depending on the purpose for the data processing. For example, we retain personal information needed to provide you with products and services, to facilitate transactions you have requested, or to engage in marketing activities, and for so long as necessary to comply with applicable laws and regulations (including tax law) and defend our legal or business interests. In all other cases, we retain your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Policy.

Firsthand is based in the United States and the personal information that we (and our third party service providers) collect and process is retained and stored in the United States. Please be aware that (i) the United States may not

provide the same level of protection of personal information as in your country, state, or jurisdiction of residence or nationality, (ii) the European Union and other foreign authorities have determined that, in some circumstances, the United States does not provide an adequate level of protection for personal information, and (iii) when transferred to the United States, your personal information may be accessible by, or otherwise made available to, government authorities and officials pursuant to regulatory, judicial, and/or administrative orders, decrees, and demands, and/or other domestic laws, statutes, and regulations, applicable in the United States. In addition, we (and our third party service providers) may retain personal information in other jurisdiction that we (or our services providers) operate. You hereby consent to your personal information being transferred to, and stored in, the United States and the other jurisdictions where we (and our service providers) operate.

10. INFORMATION SECURITY

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. HOWEVER, NO INFORMATION SYSTEM CAN BE FULLY SECURE, SO WE CANNOT GUARANTEE THE ABSOLUTE SECURITY OF YOUR PERSONAL INFORMATION. MOREOVER, WE ARE NOT RESPONSIBLE FOR THE SECURITY OF INFORMATION YOU TRANSMIT TO THE ONLINE SERVICES OVER NETWORKS THAT WE DO NOT CONTROL, INCLUDING THE INTERNET AND WIRELESS NETWORKS, AND YOU PROVIDE US WITH ANY INFORMATION AND DATA AT YOUR OWN RISK. TO THE EXTENT PERMITTED BY LAW, FIRSTHAND SHALL NOT BE LIABLE OR OTHERWISE RESPONSIBLE FOR ANY DATA INCIDENT THAT COMPROMISES OR MAY COMPROMISE THE CONFIDENTIALITY, SECURITY, INTEGRITY, OR AVAILABILITY OF YOUR PERSONAL INFORMATION. The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a username and password to access the Online Services, you are responsible for maintaining the security and confidentiality of those credentials and not revealing them to others. You must contact us immediately if you have reason to believe that your username or password to our Online Services have been compromised.

11. NO PERSONAL INFORMATION COLLECTED FROM CHILDREN

Our Online Services are not directed at, nor intended for use by, children under the age of thirteen. As a result, we will not knowingly collect information from children under thirteen years of age with or without consent from their parents or guardians. If you are under the age of thirteen, you are hereby prohibited from using our Online Services or with providing us with your personal information. If you are a customer who provides us with general information about children, you hereby represent and warrant that you have the right and authority to provide us with such data.

12. YOUR RESPONSIBILITIES AND WARRANTIES

You are permitted, and hereby agree, to only provide personal information to Firsthand if such personal information is accurate, reliable, and relevant to our relationship and only to the extent such disclosure will not violate any applicable data protection law, statute, or regulation or infringe upon any individual's data privacy rights or privileges. IF YOU PROVIDE FIRSTHAND WITH ANY PERSONAL INFORMATION ABOUT YOURSELF OR A THIRD PARTY, YOU EXPRESSLY REPRESENT AND WARRANT TO FIRSTHAND THAT (I) YOU HAVE THE FULL RIGHT AND AUTHORITY TO DISCLOSE SUCH PERSONAL INFORMATION TO FIRSTHAND, (II) THE COMPANY CAN USE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY, AND (III) YOU ARE IN COMPLIANCE WITH THE REQUIREMENTS SET FORTH HEREIN. YOU ALSO AGREE TO FULLY REIMBURSE FIRSTHAND FOR ANY DAMAGES, LOSSES, OR EXPENSES THAT ARISE BASED ON YOUR VIOLATION OF YOUR REPRESENTATIONS, WARRANTIES AND RESPONSIBILITIES SET FORTH IN THIS PRIVACY POLICY.

13. MARKETING; SHINE THE LIGHT LAW (CALIFORNIA PRIVACY)

You have the right to opt-out of receiving electronic direct marketing communications from us. All electronic direct marketing communications that you may receive from us, such as e-mail messages, will give you an "unsubscribe"

option of not receiving such communications from us in the future. California residents have the right to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not share personal information with third parties with whom we have reason to believe use such information for their own direct marketing purposes.

14. CALIFORNIA PRIVACY RIGHTS (CALIFORNIA CONSUMER PRIVACY ACT)

Pursuant to the California Consumer Privacy Act of 2018, as amended (“CCPA”), California residents may have additional data privacy rights, such as the right to be notified about what personal information is collected about them, and our intended use and purpose for collecting your personal information. California residents have the right to know and access the categories or specific pieces of personal information we have collected, used, disclosed, or sold about them over the past twelve (12) months; the categories of sources from which the personal information is collected; and, the business or commercial purpose for which the personal information was collected, used, disclosed, or sold. In addition, certain California residents have the right to request Firsthand transfer, to the extent feasible, personal information in certain forms and formats. California residents have the right to request that we (and any applicable service provider) delete/erase their personal information under certain circumstances. California residents have the right to opt-out of the sale of their personal information and Firsthand does not sell your personal information to third parties for profit or other valuable consideration. California residents have the right not to be subject to discrimination for asserting their rights under the CCPA. The categories of personal information we have collected about California residents in the preceding twelve (12) months, the categories of sources from which the personal information is collected, and the business or commercial purpose for collecting such personal information is set forth in this Privacy Policy.

You, or your authorized agency, may submit a CCPA data privacy rights request to Firsthand by contacting us in accordance with the details set forth below. If you make, or an authorized agent on your behalf makes, any request related to your personal information under the CCPA, Firsthand will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required under the law before addressing your request. Firsthand may require you to verify your request via email and match at least two or three pieces of personal information we have previously collected from you before granting you access to, or erasing, specific pieces, or categories of, personal information, or otherwise responding to your request. We may require written documentation that demonstrates a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein.

15. NEVADA PRIVACY RIGHTS

Although we do not currently conduct sales of personal information, Nevada residents may submit a request directing us to not sell personal information we maintain about them to third parties who will sell or license their information to others.

16. EUROPEAN, SWISS, UK DATA PROTECTION RIGHTS

If you are located in the European Economic Area, Switzerland, or the United Kingdom (UK), you may have additional rights with respect to the personal information we have about you. To the extent permitted by the European Union (EU) General Data Protection Regulation (GDPR), or applicable data protection laws in EU member states, Switzerland, or the UK, you may request the following: access to the personal information we hold about you; that inaccurate, outdated, or no longer necessary information be corrected, erased, or restricted; and, we provide your personal information in a format that allows you to transfer it to another entity. You also may withdraw your consent at any time if, and only if, we are solely relying on your consent for the processing of your personal information. You may object to our processing of your personal information where that processing is based on our legitimate interest. For purposes of clarity, we do not engage in any activity that subjects our survey participants, customers, or others to a decision based solely on automated processing, including profiling, which produces legal effects, or similarly significant results, impacting them. You may submit a data privacy rights request to Firsthand by contacting us in accordance with the details set forth below.

We process your personal information in accordance with the legal bases set forth in the GDPR. For example, our processing of personal information (as described herein) is justified based on the following GDPR provisions and which may overlap: (1) processing is based on your consent; (2) processing is necessary for our legitimate interests as set out herein; (3) processing is necessary for the performance of a contract to which you are a party; and (4) processing is required to comply with a legal or statutory obligation. You have the right to lodge a complaint with your competent [data protection authority](#). If you wish to exercise any of these rights, please contact us in accordance with the instructions provided below in the “Contact Us” section. We may need to collect and process information about you solely for the purpose of responding and satisfying any data right request you may have.

17. DO NOT TRACK SIGNALS

Some web browsers may transmit “Do Not Track” signals to our Online Services. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not, unless otherwise required by law, take action in response to these signals.

18. PERSONS WITH DISABILITIES

Firsthand strives to ensure that every person has access to information related to our products and services, including this Privacy Policy. Please contact us if you would like this Privacy Policy provided in an alternative format and we will seek to meet your needs.

19. AGGREGATED DATA

Firsthand collects and retains de-identified, and aggregated data relating to the use of our Online Services (“**Aggregated Data**”), and we use such Aggregated Data for our own business purposes, such as to analyze customers and to develop, improve, and market our services. For the avoidance of doubt, we may use Aggregated Data for any purpose and such Aggregated Data is not subject to this Privacy Policy.

20. COMMUNICATIONS DATA

For the avoidance of doubt, in the event you provide Firsthand with a telephone number as part of your registration to the Online Services or as part of a purchase or transaction with us, you hereby consent and agree that Firsthand (or our service providers) may contact said telephone number by any means (including SMS/text message) for service and transactions purposes.

21. CHANGES TO THE PRIVACY POLICY

At any time, we reserve the right to add to, modify or remove portions of our Privacy Policy. The effective date of our Privacy Policy will be included at the beginning of the Privacy Policy and will serve as a notice of when changes have been implemented to the Privacy Policy. It is your responsibility to review this Privacy Policy to determine if any revisions have been made to it. Your continued use of our Online Services after any revisions have been made to this Privacy Policy will indicate your acknowledgement of such changes and agreement to be bound by the updated terms and conditions set forth herein.

22. CONTACT US

If you have questions regarding this Privacy Policy, would like to request more information from us, or would like to exercise a data privacy right or privilege, please contact us at any of the following: (address) Firsthand, 132 West 31st Street, 16th Floor, New York, NY 10001, (telephone) 1.800.322.8755, and (email) privacy@firsthand.co.

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