



## Privacy Policy

Last Updated: January 10, 2022

At Dataminr, Inc. (“Dataminr,” “we,” “us” or “our”), we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal information when you visit our website, [dataminr.com](https://dataminr.com), or access our services (collectively, the “Services”). **By using or accessing our Services in any manner, you acknowledge that you have read the practices and policies outlined below, and you understand that we will collect, use and share your information as described in this Privacy Policy.**

Remember that your use of Dataminr’s Services is at all times subject to our Terms of Use and/or any separate agreement you’ve entered into with us, as applicable. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

You may print a copy of this Privacy Policy by clicking here. If you have a disability, you may access this Privacy Policy in an alternative format by contacting [privacy@dataminr.com](mailto:privacy@dataminr.com).

### What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control (such as social media providers). If you are a resident of the European Economic Area or the State of California, you have certain additional rights which are explained in this Policy.

### Personal Data

#### Categories of Personal Data We Collect

This chart details the categories of Personal Data that we may collect and and/or may have collected over the past 12 months:

<b>Category of Personal Data Collected</b>	<b>Categories of Third Parties With Whom We Share this Personal Data for a Business Purpose:</b>
<b>Contact Data</b> (e.g., name, username, email, phone number, address)	• Service Providers
<b>Account Data</b> (e.g., topical or geographic interests, search parameters, your use of the Services)	• Service Providers
<b>Log Data</b> (e.g., IP address, data and time of Services usage, device ID, domain server, device type, browser type, operating system statistics, search queries)	• Service Providers
<b>Web Analytics</b> (e.g. referring source through which you access the Services; non-identifiable request IDs, statistics regarding	• Service Providers

interaction between device/browser and the Services, links to third party applications used through the Services, dashboard interactions, website clicks, new windows opened)	
<b>Geolocation Data</b> (e.g., location data if opted in through your mobile device)	<ul style="list-style-type: none"> <li>• Service Providers</li> </ul>
<b>Publicly-Available Content Provided through the Services, Including Social Media Information</b> (e.g. profile information such as usernames, followers, number following, URL, location, language, tags, profile image, verified status, hashtags; profile content such as description, occupation, preferred channels, likes; post content such as tweets, status updates, timestamp, hashtags, language, geolocation) <i>Please note we do not collect the foregoing publicly-available content as a result of your use of the website or Services</i>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Users of Services</li> </ul>

### Categories of Sources of Personal Data

We may collect Personal Data about you from the following categories of sources:

- **You**
  - When you provide such information directly to us.
  - When Personal Data about you is automatically collected in connection with your use of our Services (see the subsection titled “Tracking Tools, Advertising and Opt-Out” below).
- **Third Parties**
  - Service Providers. For example, we may use analytics service providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support. We also receive information about you from some of our service providers who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.
  - Social networks connected to the services. If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your Account with us.
  - Third-party data sources. We have relationships with third parties to receive data that you post publicly. We may also have access to information that you post on other social media platforms. Social media users who do not want their data processed by Dataminr can make their account or posts private or, to the extent applicable, remove Dataminr and its representatives from their followers. This Privacy Policy does not cover the use of Personal Data by any third parties that you submit to such third parties, and we aren’t responsible for their privacy policies and practices. To learn more about how these third-party data sources treat your Personal Data, you should reference the privacy terms of those sources.

### How We Use Your Personal Data

- **Providing, Customizing and Improving the Services**
  - Meeting or fulfilling the reason you provided the information to us.
  - Providing support and assistance for the Services.
  - Creating and managing your Account or other user profiles.

- Personalizing the Services, website content and communications based on your preferences.
- Processing orders or other transactions; billing.
- Providing you with the products, services or information you request.
- Improving and developing the Services, including testing, research, internal analytics and product development.
- Doing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).
- When you join a call with us we may record the call for our training purposes. You will be made aware of this before we record any call (and may decline the recording at any time).
- **Marketing the Services**
  - Marketing and selling the Services.
  - Showing you advertisements for the Services, including interest-based or online behavioral advertising.
  - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Corresponding with You**
  - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Dataminr or the Services.
- **Meeting Legal Requirements and Enforcing Legal Terms**
  - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
  - Protecting the rights, property or safety of you, Dataminr or another party.
  - Enforcing any agreements with you.
  - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **How We Share Your Personal Data**

We disclose your Personal Data to the categories of service providers and other parties listed in this section.

- **Service Providers**
  - These are third parties acting on our behalf that help us provide and market our Services, including payment processors, ad networks, marketing providers, security and fraud prevention providers, hosting and other technology and communications providers, data storage, bill collection, analytics providers, and staff augmentation and contract personnel.
- **Users of Services**

We use publicly-available information we obtain from third-party data sources to provide breaking news alerts to our customers, so we may share your publicly-available social media information with other users of our Services. Social media users who do not want their data processed by Dataminr can make their account or posts private and, to the extent applicable, remove Dataminr and its representatives from their followers.

### Legal Obligations

We may share any Personal Data that we collect with relevant third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “How We Use Your Personal Data” section above.

### Business Transfers

All Personal Data may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should any of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

### Tracking Tools, Advertising and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”). For further information on our use of Cookies, please see our [Cookie Notice](#).

### Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. We store information in paper-based files or electronic records in secure databases in Europe, the U.S., and Australia (including trusted third-party storage providers). Personal Data may be collected in paper-based documents and converted to an electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorized access, modification or disclosure. We maintain physical security over paper and electronic data storage, such as through locks and security systems at our premises. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to our computer systems. The Services use industry standard Transport Layer Security (TLS) technology to allow for the encryption of Personal Data you provide to us.

***You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the Internet or storing data is completely secure.***

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services or to fulfill the purposes outlined in this Privacy Policy. In some instances we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information could not be used by us or a third party to identify you personally.

## **Personal Data of Children**

We do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at [privacy@dataminr.com](mailto:privacy@dataminr.com).

## **California Resident Rights**

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at [privacy@dataminr.com](mailto:privacy@dataminr.com).

### **Access**

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third-party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third-party recipient.

### **Deletion**

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested. If your deletion request is subject to one of the exceptions under the CCPA, we may deny your deletion request.

### **Exercising Your Rights**

To exercise the rights described above, you must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2)

describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

- Email us at: [privacy@dataminr.com](mailto:privacy@dataminr.com)
- [Submit a form here](#)

You may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

#### *Personal Data Sales Opt-Out and Opt-In*

Under some state laws, including the CCPA, sharing your data through third party Cookies for online advertising may be considered a “sale” of information. As described in the “Tracking Tools, Advertising and Opt-Out” section above, we have incorporated Cookies from certain third parties into our Services. These Cookies allow those third parties to receive information about your activity on our Services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our Services or on other websites you visit. Except for these sales through third party Cookies, we don’t sell your Personal Data. You can opt out of these sales by following the instructions in this section.

We may sell your Personal Data to the following categories of Third Parties:

- Ad networks
- Marketing providers

Over the past 12 months, we may have sold the following categories of your Personal Data to the above-referenced Third Parties:

- Log Data
- Web Analytics

You have the right to opt-out of the sale of your Personal Data. You can exercise this right by clicking on the “Do Not Sell My Personal Information” at the bottom of our website and changing your Cookie preferences.

Once you have submitted an opt-out request, we will not ask you to reauthorize the sale of your Personal Data for at least 12 months.

To our knowledge, we do not sell the Personal Data of minors under 16 years of age.

#### *We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA*

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

#### **Other State Law Privacy Rights**

##### *California Resident Rights*

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at [privacy@dataminr.com](mailto:privacy@dataminr.com).

##### *Nevada Resident Rights*

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at [privacy@dataminr.com](mailto:privacy@dataminr.com) with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

#### **Privacy Act Systems of Records**

When Dataminr operates a system of records subject to the Privacy Act of 1974 or comparable U.S. government agency regulations, including any use of information contained in such a system of records, our use and disclosure of that information ("Privacy Act Information") is subject to the applicable Systems of Records Notice and applicable agency regulations, which control to whatever extent they may conflict with this Policy. Dataminr employees who create, receive or otherwise handle Privacy Act Information are required to undergo initial and annual Privacy Act training as a condition of their access to the information. Dataminr prohibits any unauthorized use of a system of records or unauthorized disclosure, access, handling, or use of Privacy Act Information. Any person can report a suspected or confirmed breach of Privacy Act Information or the unauthorized disclosure, access, handling, or use of Privacy Act Information to Dataminr using the contact information below.

#### **UK and EEA Data Subject Rights**

##### *UK and EEA Residents*

If you are a resident of the European Union ("EU"), United Kingdom, Lichtenstein, Norway or Iceland, you may have additional rights under the EU General Data Protection Regulation or equivalent applicable legislation in your jurisdiction (the "GDPR") with respect to your Personal Data, as outlined below.

For this section, we use the terms "Personal Data" and "processing" as they are defined in the GDPR, but "Personal Data" generally means information that can be used to individually identify a person, and "processing" generally covers actions that can be performed in connection with data such as collection,

use, storage and disclosure. Dataminr will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this this section and any other provision of this 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 section or whether any of the following applies to you, please contact us at [privacy@dataminr.com](mailto:privacy@dataminr.com). Note that we may also process Personal Data of our customers' end users or employees in connection with our provision of certain services to customers, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

### Personal Data We Collect

The "Categories of Personal Data We Collect" section above identifies the Personal Data that we collect from you.

### Personal Data Use and Processing Grounds

The "How We Use Your Personal Data" section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing primarily include consent, contractual necessity and our "legitimate interests" or the legitimate interest of others, as further described below.

- Contractual Necessity: We process the following categories of Personal Data as a matter of "contractual necessity", meaning that we need to process the data to perform under our contractual relationship with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all of the Services that require such data.
  - Contact Data
  - Account Data
- Legitimate Interest: We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties.
  - Contact Data
  - Account Data
  - Log Data
  - Web Analytics
  - Publicly Available Social Media Information

Examples of these legitimate interests include (as described in more detail above):

- Operation and improvement of our business, products and Services
- Marketing of our products and Services
- Provision of customer support
- Corresponding with you
- Protection from fraud or security threats
- Compliance with legal obligations
- Completion of corporate transactions



- **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects or if it is necessary for a task carried out in the public interest.

### Sharing Personal Data

The “How We Share Your Personal Data” section above identifies how we share your Personal Data with third parties.

### UK and EEA Data Subject Rights

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 us at [privacy@dataminr.com](mailto:privacy@dataminr.com).

Please note that in some circumstances, we may not be able to fully comply with your request, such as if a request 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 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.
- **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 such data. You can also correct some of this information directly by logging on to your account.
- **Erasure:** You can request that we erase some or all of 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 of 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.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.
- **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 Dataminr’s practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

### International Transfers of Personal Data

The Services are hosted and operated in the United States (“U.S.”) through Dataminr and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside and may not provide equivalent levels of data protection as such jurisdiction. The recipients of such Personal Data may be located in the UK, the EEA, the U.S., Australia, and possibly other countries. We will comply with applicable laws when transferring your Personal Data overseas, including taking reasonable steps to ensure that your Personal Data receives an adequate level of protection in the jurisdictions in which we process it. Such protections may include: (i) implementing a data processing agreement incorporating standard data protection clauses promulgated by the European Commission or the UK’s Secretary of State, (ii) implementing binding corporate rules for data protection that align with the GDPR’s requirements, or (iii) adhering to an industry- or technology-specific approved code of conduct approved by the European Commission.

### Other Rights

#### Communications from Dataminr

If you do not want to receive marketing communications from us, please indicate your preference by emailing us at [privacy@dataminr.com](mailto:privacy@dataminr.com) or otherwise following the instructions included in the email or changing your email preferences in your account settings. Even if you opt out of receiving such communications, we may send you non-marketing communications (such as Services-related communications or notices required by law).

### Changes to this Privacy Policy

We’re constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the [www.dataminr.com](http://www.dataminr.com) website, by sending you an email and/or by some other means. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

### Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- (646) 701-7826
- [www.dataminr.com](http://www.dataminr.com)
- [privacy@dataminr.com](mailto:privacy@dataminr.com)

- 135 Madison Ave., Ninth Floor, New York, NY 10016

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are located in the UK or the EEA, you may use the following information to contact our Data Protection Officer:

- DPO@dataminr.com
- Dataminr Data Protection Officer, Fieldfisher, Unit 401 Capel Building, Mary's Abbey, Dublin 7, Ireland

If you are outside of the UK and the EEA you may wish to take your request or complaint up with the local data protection authority in your jurisdiction.