



CONVERGENCE

OPTIMAL PERFORMANCE

Privacy Policy

Last Modified: July 2018

Our Privacy Policy explains:

- What information we collect and why collect it
- How we use that information.
- The choices we offer, including how to access and update information.

Your privacy matters to Convergence Inc. so whether you are new to Convergence Inc. or a long- time user, please do take the time to get to know our practices – and if you have any questions please [contact us](mailto:ggainer@convergenceinc.com) at ggainer@convergenceinc.com

Information We Collect

We collect information in the following ways:

- **Information we collect from your company's regulatory filings.** We regularly collect, normalize and enrich data that companies are required to give to regulators that the regulators then make available to the public. This data may include information on you that is specifically disclosed in these filings, or derived from the data in these filings, data on you including your role at the firm, when you began that role, your contact information, including email and phone number, your ownership stake in the firm, where you went to school and the regulatory licenses you hold. For the avoidance of doubt, we do not collect data on you that is considered unrelated to the regulatory filings and other data about your company. For example, we do not attempt to collect or derive non-company data on you, including your personal emails, where you live, your compensation, or any other

information relating to your life and activities outside the firm(s) in which you have or are for which you are currently working.

- **Information that we purchase from third party-vendors.** We purchase information from various vendors that is incorporated into our products and services and follows the same principles described in “**Information we collect from your company’s regulatory filings.**”
- **Information you give us.** For example, many of our services require you to sign up for a Convergence Inc. Account. When you do, we’ll ask for **Company information**, like your name, email address, telephone number or credit card to store with your account
- **Information we get from your use of our services.** We collect information about the services that you use and how you use them, like when you watch a video on YouTube, visit a website that uses our advertising services, or **view and interact with our ads** and content. This information includes:
 - **User Information**
We collect **user-specific information** (such as names, titles, and locations and email addresses)
 - **Log information**
When you use our services or view content provided by Convergence Inc., we automatically collect and store certain information in **server logs**. This includes:
 - device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.

How we use information we collect

We use the information we collect and from all our services to **provide, maintain, protect** and improve them, to **develop new ones**, and to **protect Convergence Inc. and our users**. We also use this information to offer you tailored content – like giving you more relevant data and Insights.

We may use the contact information that you provide for your Convergence Inc. Profile across all the services we offer that require a Convergence Inc. Account. In addition, we may replace past names associated with your Convergence Inc. Account so that you are represented consistently across all our services.

When you contact Convergence Inc., we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

Our automated systems analyze your content (including emails) to provide you personally relevant product features, such as customized search results, tailored advertising, and spam and malware detection.

Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

- Review and update your Convergence Inc. activity controls to decide what types of data, such as videos you've watched on YouTube or past searches, you would like saved with your account when you use Convergence Inc. services. You can also visit these controls to manage whether certain activity is stored in a cookie or similar technology on your device when you use our services while signed-out of your account.

Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines, including Convergence Inc. Our services provide you with different options on **sharing** and **removing your content**.

Accessing and updating your personal information

Whenever you use our services, we aim to provide you with **access to your personal information**. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we must keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are legally permitted or unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this,

after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

Information we share

We only share information with companies, organizations and individuals that subscribe to subscription services offered by of Convergence Inc. unless one of the following circumstances applies:

- For legal reasons
 - We will share company and user information with companies, organizations or individuals outside of Convergence Inc. if we have a good- faith belief that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable law, regulation, **legal process or enforceable governmental request**. enforce applicable Terms of Service, including investigation of potential violations, detect, prevent, or otherwise address fraud, security or technical issues and protect against harm to the rights, property or safety of Convergence Inc., our users or the public as required or permitted by law.

We may share non-personally identifiable information publicly and with our partners – like publishers or connected sites. For example, we may share information publicly **to show trends** about the micro and macro trends in the market and specific trend information on your company.

If Convergence Inc. is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

Information security

We work hard to protect Convergence Inc. and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We encrypt many of our services using SSL.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to your company and user information to Convergence Inc. employees, contractors and agents who need to know that information to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

When this Privacy Policy applies

Our Privacy Policy applies to all the services offered by Convergence Inc. Inc. and its affiliates.

Changes to our Privacy Policy

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

Our Commitment to EU Directive on Global Data Protective Rights (GDPR)

Article 2, Section 2(d) of the GDPR directive states the regulation does not apply to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties. The company has been advised by counsel that its use of publicly available SEC Form Adv and Form D filing data qualifies under the exemption line and is consistent with the SEC's mandate to protect investors from fraud. It makes this information available to the public to provide the investing public with data that it can use to prevent, investigate, detect and prosecute securities fraud. The company's products and services ("Offerings") are consistent with this mandate and depend on the SEC's ability to share accurate information with the public.

Any personal data that may be included in the "Offerings" exists in the public domain because the person is associated with an entity regulated by the SEC and must disclose such data to comply with SEC regulations. Registrants do so voluntarily with the full expectation and understanding that the SEC will publish the information in accordance with its mandate and make it available to the public.

The Company plans to monitor its GDPR compliance efforts on an on-going basis and will work with counsel to determine whether the "Offerings" continue to comply with GDPR and with SEC regulations. Efforts include, but are not limited to, updating relevant privacy policies, database maintenance and monitoring, and industry best practices.