

# Speechling

# Privacy Policy

Effective date: May 5th, 2017

## Welcome!

*Speechling* ("*Speechling*" or "us" or "we") is built on rigorous standards of security and privacy. *Speechling* participates in and has certified its compliance with the Privacy Shield Framework. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's [Privacy Shield website](#).

This Privacy Policy explains how *Speechling* collects, uses, and discloses Personally Identifiable Information ("PII") about you and information owned by your organization ("Customer Data") when you use our website and online products (collectively, the "Service"), or when you otherwise interact with us. This Privacy Policy also describes your choices regarding use, access, and correction of personal information collected about you through our Service. By using or accessing our Service, you agree to accept the practices described in this Privacy Policy.

We may change this Privacy Policy periodically. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage

you to review the Privacy Policy whenever you access the Service or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

## **1. Collection of Information**

### **1.1. Information You Provide to Us**

We collect information you provide directly to us. For example, we collect information when you create an account, participate in any features of the Service, fill out a form, pay for subscriptions, register to attend our events, apply for a job, communicate with us via third party social media sites, request customer support, or otherwise communicate with us. The types of information we may collect include your name, email address, company name, postal address, phone number, billing information, and any other information you choose to provide. To the extent you provide credit card information through our Service, that information is collected and processed by our third party payment processor pursuant to their privacy policy and practices.

### **1.2. Information We Collect Automatically When You Use the Service**

When you access or use our Service, we automatically collect information about you, including:

1. Log files: We gather certain information about your use of the Service, including the type and language of the browser you use, the type and version of your device's operating system, access times, pages viewed, your IP address and geographic area, and

the page you visited before navigating to our Service, and store it in log files. We do not monitor or log data collected from your servers when using the Service, but we may log or monitor information about your access to our Service.

2. Information collected by cookies and other tracking technologies: We use various common technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Service and your experience, see which areas and features of our Service are popular, and count visits. Web beacons are electronic images that may be used in our Service or emails, and they help deliver cookies, count visits, and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see "Your Choices" below.
3. Information collected by advertising and analytics services provided by others: We may allow others to provide analytics services and serve advertisements on our behalf across the Internet and in applications. These third-parties may use cookies, web beacons, and device identifiers to automatically collect information about your use of our Service and other websites and applications, including your IP address, web browser, pages viewed, time spent on pages or in apps, links clicked, and conversion information.

### **1.3. Information We Collect from Other Sources**

We may also obtain information from other sources and combine that with information we collect through our Service.

1. Personal Information: For example, if you create or log into your *Speechling* account using your Google Apps credentials via single sign-on, we will have access to certain information such as your

name and email address as authorized in your Google Apps profile settings. If you connect with *Speechling* accounts on third party social networking sites, we may also collect information about your social networking accounts, for example, your name, user name or handle, public profile, and email address.

2. Customer Data: You may also electronically submit data or information owned by your organization ("Customer Data") to our Service. *Speechling* will not review, share, or distribute Customer Data without your approval or as may be required by law. *Speechling* may access Customer Data only for the purposes of providing the service, preventing or addressing service or technical problems, at a your request in connection with customer support matters, or as may be required by law.

## 2. Use of Information

We may use information about you for various purposes, including to:

1. Deliver: Provide, operate, and improve our Service, including internal operations and software updates
2. Transact: Process transactions and send you related information, including confirmations and invoices
3. Support: Send you technical notices, updates, security alerts, support/administrative messages and respond to your comments, questions, and requests to provide technical support and customer service
4. Protect: Enforce our Terms and investigate and prevent fraudulent, unauthorized, and illegal activities to protect the rights and property of *Speechling* and others

5. Communicate: Provide news and information about products, services, offers, promotions, contests, rewards, and events offered by *Speechling* and others that we think will be of interest to you, and to deliver entries and rewards
6. Understand: Analyze trends, usage, and activities by combining your information with information we get from others to help understand your needs and provide you with better service
7. Personalize: Provide advertisements, content, or features that match your profiles or interests
8. Carry out any other purpose described to you at the time the information was collected

### **3. Disclosure of Information**

*Speechling* does not sell, rent, or disclose PII or Customer Data with any third parties, except under the following circumstances or as otherwise described in this Privacy Policy:

1. With vendors, consultants, and other service providers who need access to such information to carry out work on our behalf only to the extent necessary to provide these services to us, in which case we will require our partners and affiliates to honor this Privacy Policy.
2. In response to a request for information if we believe disclosure is permitted by, in accordance with, or required by, any applicable law, regulation, or legal process such as to comply with a subpoena
3. If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of *Speechling* or others

4. In connection with, or during negotiations of, any merger, sale of *Speechling* assets, financing, or acquisition of all or a portion of our business by another company
5. Between and among *Speechling* and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership
6. When information is aggregated or de-identified, which cannot reasonably be used to identify you
7. With your consent or at your direction. We display personal testimonials of satisfied users on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us using the information listed in the "Contact Us" section below.

## 4. Security

*Speechling* has implemented reasonable security measures to protect information from loss, theft, misuse, unauthorized access, disclosure, and destruction. We have implemented physical security controls, limited access to a database and applications, and encryption techniques such as SSL/TLS. To further protect yourself, use a strong password, do not use the same passwords to access your *Speechling* accounts that you use with other accounts, and protect your usernames and passwords to help prevent others from accessing your accounts and services.

Information we collect may be retained for as long as needed to fulfill legitimate business purposes, including the purposes outlined in this Privacy Policy, or for a period of time specifically required by law.

## 5. Cross-Border Data Transfers

*Speechling* is based in the United States and the U.S. law governs the information we collect. By accessing or using the Service or otherwise providing information to us, you consent to the processing, transfer, and storage of information in and to the U.S. and other countries, where you may not have the same rights and protections as you do under local law. With respect to personal data relating to residents of the European Economic Area ("EEA Data"), *Speechling* adheres to the [Privacy Shield Principles outlined here](#). For purposes of enforcing compliance with the Framework, *Speechling* is subject to the investigative and enforcement powers of the Federal Trade Commission.

Without limiting the above, *Speechling* adheres to the Principle of Accountability for Onward Transfer. As noted in "Disclosure of Information" above, we may transfer personal information (including EEA Data) to our vendors, consultants, and other service providers who need access to such EEA Data to carry out work on our behalf. Under certain circumstances, we may remain liable for the acts of those third-party service providers for their handling of EEA Data that we transfer to them. Under certain circumstances, we may be required to disclose EEA Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

EEA individuals have rights to access personal data about them, and to limit use and disclosure of their personal data. If you believe *Speechling* holds EEA Data about you, and wish to request access (or to limit use or disclosure) of such EEA Data, you can submit a written request to the point of contact listed in the "Contact Us" section below. If the requested EEA Data is Customer Data, please include the name of the applicable

user in your request; we will refer the request to that user to respond directly to you and will support them as needed to respond to your request. We will respond to all requests within a reasonable timeframe.

Please direct any inquiries or complaints regarding our compliance with the Principles to the point of contact listed in the "Contact Us" section below. If *Speechling* does not resolve your complaint within 45 days, you may submit your complaint free of charge to our U.S.-based third party dispute resolution provider and designated Privacy Shield dispute resolution provider [here](#). Under certain conditions specified by the Principles and more fully described on the [Privacy Shield website](#), you may also be able to invoke binding arbitration to resolve your complaint through the Privacy Shield Panel.

## **6. Social Sharing and External Links**

Our Service may offer social sharing features and other integrated tools, which let you share actions you take on our Service with other media, and vice versa. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

Our Service may contain links to other third party websites. Even if the third party is affiliated with *Speechling* through a business partnership or otherwise, we are not responsible for the privacy practices of other websites. We encourage our users to be aware when they leave the Website to read the privacy statements of each and every website that



collects personal information. This Privacy Statement applies solely to information collected by *Speechling*.

## 7. Your Choices

1. Account information: Our users may access or update personal information they have provided by logging into the Service. Users may also deactivate their accounts by logging into the Service, but note that we may retain certain personal information as necessary to comply with our legal obligations or for legitimate business purposes, such as to resolve disputes or enforce our agreements. We may also retain cached or archived copies of personal information for a certain period of time.
2. Cookies: Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Service.
3. Promotional communications: You may opt out of receiving promotional emails from *Speechling* by following the instructions in those emails. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

## Contact Us

If you have any questions or concerns about this Privacy Policy, please email us at [admin@speechling.com](mailto:admin@speechling.com).