

Updated May 2018

PRIVACY POLICY

Bluepath Consulting Website Global Privacy Policy

Thank you for choosing to be part of our community at Bluepath Consulting. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at info@bluepathconsulting.com.

In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services. It is Bluepath Consulting's policy to comply with all applicable privacy and data protection laws. This commitment reflects the value we place on earning and keeping the trust of our employees, customers, business partners and others who share their personal information with us.

This Global Privacy Policy (this "Policy") describes how Bluepath Consulting protects your privacy when we collect personal information on Bluepath Consulting Internet sites (such as bluepathconsulting.com and bluepathstudio.com). As used in this Policy, the term "personal information" means information that identifies you personally, alone or in combination with other information available to us.

Your Consent

By visiting an Bluepath Consulting website or providing personal information to us, you are consenting to the collection, use and disclosure of your personal information as described in this Policy. If you do not consent to the collection, use and disclosure of your personal information as described in this Policy (and any applicable Country or Web Site Privacy

Statements), do not use Bluepath Consulting Internet Sites, contact Bluepath Consulting, or Submit Data to Bluepath Consulting via Internet form.

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

TABLE OF CONTENTS

1. WHAT INFORMATION DO WE COLLECT?
2. HOW DO WE USE YOUR INFORMATION?
3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?
4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?
5. HOW LONG DO WE KEEP YOUR INFORMATION?
6. HOW DO WE KEEP YOUR INFORMATION SAFE?
7. WHAT ARE YOUR PRIVACY RIGHTS?
8. DO WE MAKE UPDATES TO THIS POLICY?
9. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

Limitations on the Collection, Use, and Disclosure of Personal Information

To the extent required by applicable law, whenever Bluepath Consulting collects personal information on an Bluepath Consulting Internet Site, Bluepath Consulting will:

- provide timely and appropriate notice to you about its data practices;
- collect, use, disclose and transfer your personal information only with your consent, which may be express or implied, depending on the sensitivity of the personal information, legal requirements, and other factors;
- collect your personal information only for specific, limited purposes. The information we collect will be relevant, adequate and not excessive for the purposes for which it is collected;
- process your personal information in a manner consistent with the purposes for which it was originally collected or to which you have subsequently consented;
- take commercially reasonable steps to ensure that your personal information is reliable for its intended use, accurate, complete, and, where necessary, kept up-to-date;

1. WHAT INFORMATION DO WE COLLECT?

Personal Information you disclose to us

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make and the products and features you use. The personal information we collect can include the following:

Name and Contact Data

We collect your first and last name, email address, phone number, and other similar contact data.

Information automatically collected

Like many businesses, when you access and use a Bluepath Consulting Sites, there are 3 ways we may collect information about you:

A) Information Sent to Us by Your Web Browser

Bluepath Consulting collects information that is sent to us automatically by your web browser. This information typically includes the IP address of your Internet service provider, the name of your operating system, browser and device characteristics, referring URLs, device name, country, location, information about how and when you use our Sites and other technical information. The information we receive depends on the settings on your web browser. Please check your browser if you want to learn what information your browser sends or how to change your settings. The information provided by your browser does not identify you personally. We use this information to create statistics that help us improve our sites and make them more compatible with the technology used by our Internet visitors

B) Information You Knowingly and Voluntarily Provide

Bluepath Consulting collects the information you knowingly and voluntarily provide when you use an Bluepath Consulting Internet Site, for example, the information you provide when you sign up to receive email alerts, when you complete a survey, or when you ask us a question or email us with feedback. In many cases, this information will be personal information. Bluepath Consulting uses this information for the purposes for which you provide it. We may also use the information we collect on Bluepath Consulting Internet Sites for various business purposes such as customer service, fraud prevention, market research, improving our products and services, and providing you and your company with information and offers we believe may be of interest to you. We may also remove all the personally identifiable information and use the rest for historical, statistical or scientific purposes.

C) Information collected from other sources

We may obtain information about you from other sources, such as public databases, joint marketing partners, as well as other third parties. Examples of the information we receive from other sources include: social media profile information, marketing leads and search results, and links, including paid listings (such as sponsored links).

Links to Third Party Internet Sites

Bluepath Consulting Internet Sites may contain links to Internet sites that are not operated by Bluepath Consulting. These links are provided as a service and do not imply any endorsement of the activities or content of these sites, nor any association with their operators. Bluepath Consulting does not control these Internet sites and is not responsible for their content, security, or privacy practices. We urge you to review the privacy policy posted on websites you visit before using the site or providing personal information.

2. HOW DO WE USE YOUR INFORMATION?

We use personal information collected via our Sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests (“Business Purposes”), in order to enter into or perform a contract with you (“Contractual”), with your consent (“Consent”), and/or for compliance with our legal obligations (“Legal Reasons”). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To send you marketing and promotional communications** for Business Purposes. We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time.
- **To send administrative information to you** for Business Purposes and/or Legal Reasons. We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.
- **Deliver targeted advertising to you** for our Business Purposes. We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- **Request feedback** for our Business Purposes. We may use your information to request feedback and to contact you about your use of our Sites.
- **To protect our Sites** for our Business Purposes. We may use your information as part of our efforts to keep our Sites safe and secure.
- **To enforce our terms, conditions, and policies** for Business Purposes and/or for Legal Reasons.
- **To respond to legal requests and prevent harm** for Legal Reasons. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing, and your experience.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

Bluepath Consulting will never sell personal information collected from its Internet sites to mailing list brokers or other third parties. Bluepath Consulting may share your personal information with third parties we hire to perform services for us. These third parties are required to use the personal information we share with them only to perform services on our behalf and to treat your personal information as strictly confidential. In some cases, Bluepath Consulting may share your personal information with third parties who partner with us to provide products and services to our customers. When we do so, we will require our business partners to use the personal information we share with them in a manner consistent with the purposes for which it was originally collected (or to which you subsequently consented) and only as permitted under this Policy, any applicable Country or Web Site Privacy Statements, and all applicable privacy and data protection laws. In certain, limited circumstances we may share or transfer personal information to unrelated third parties.

For example, we may provide personal information to a third party for the following reasons:

- at your request.
- to comply with a legal requirement or court order.
- to investigate a possible crime, such as identity theft.
- in connection with the sale, purchase, merger, reorganization, liquidation or dissolution of Bluepath Consulting or an Bluepath Consulting business unit.
- under similar circumstances. If such an event occurs, we will take appropriate steps to protect your personal information.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

Bluepath Consulting may obtain information about you by installing a “tag” on your computer’s hard drive. This tag is known as a “cookie.” All Bluepath Consulting Internet Sites use “session cookies.” A session cookie is used to tag your computer with a computer-generated, unique identifier when you access our site. A session cookie does not identify you personally and expires after you close your browser. We use session cookies to collect statistical information about the ways visitors use our sites’, which pages they visit, which links they use, and how long they stay on each page. We analyze this information in statistical form to better understand our visitor’s interests and needs to improve the content and functionality of our

sites. Some Bluepath Consulting Internet sites also use “persistent cookies.” These cookies do not expire when you close your browser; they stay on your computer until you delete them. By assigning your computer a unique identifier, we are able to create a database of your previous choices and preferences, and in situations where these choices or preferences need to be collected again, they can be provided by us automatically, saving you time and effort. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit an Bluepath Consulting Internet Site, you may be unable to use all the functionality of the site if your browser rejects our cookies.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

Bluepath Consulting retains all personal information collected on Bluepath Consulting Internet Sites and web forms as long as necessary to provide the services, products, and information you request or as permitted by applicable law.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Notwithstanding the foregoing, we reserve the right to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

Access to Personal Information

You may review, correct and update the personal information that you provide to us by writing to us at Bluepath Consulting, 79 Madison Ave, 3rd Floor, New York, NY, 10016, USA or emailing us at info@bluepathconsulting.com.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

Your personal information will generally be stored in Bluepath Consulting databases or databases maintained by our service providers. Most of these databases are stored on servers located in the United States. To the extent required by law, if your personal information will be transferred outside your country an appropriate notice will be provided. Bluepath Consulting maintains reasonable safeguards to protect the confidentiality, security, and integrity of your personal information. Although we use security measures to help protect your personal information against unauthorized disclosure, misuse or alteration, as is the case with all computer networks linked to the Internet, we cannot guarantee the security of information provided over the Internet and will not be responsible for breaches of security beyond our reasonable control.

7. WHAT ARE YOUR PRIVACY RIGHTS?

If you are a resident of the European Economic Area, you have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the Contact Bluepath Consulting below.
- In addition, you can object to the processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under Contact Bluepath Consulting below.
- 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 emails we send you. Registered users can manage their account settings and email marketing preferences as described in the "Choices Regarding Your Personal Information" section below. If you are an unregistered user, or to opt-out of other forms of marketing (such as postal marketing or telemarketing), you may contact us using the contact details provided under Contact Bluepath Consulting below.
- Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can manually choose to set your browser to remove cookies and to reject cookies.

8. DO WE MAKE UPDATES TO THIS POLICY?

Bluepath Consulting reserves the right, at its sole discretion, to change, modify, add or remove any portion of this policy, in whole or in part, at any time. Changes in Policy will be effective when posted. You agree to review this Policy periodically to be aware of any changes. Your continued use of the Site after any changes to this Policy will be considered acceptance of those changes.

9. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have any questions about this Policy or our use of your personal information, you may email us at info@bluepathconsulting.com or by post to:

Bluepath Consulting,
79 Madison Ave, 3rd Floor
New York, NY 10016
United States