



# Privacy Policy

This Privacy Policy is provided by Hill 17 Solutions (“Hill 17”) to let you know what information is collected, how it’s collected, how we protect it, use it, and share it, including when you access or use our Site or Services, as defined in our Terms of Use. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in the Terms of Use. In the event of any conflict between this Privacy Policy and the Terms of Use, the Terms of Use shall control to By submitting your information and by using the Hill 17 Site (“Site”) and Hill 17 Services (“Services”),

Hill 17 will assume that you have read, understood, and consent to this Privacy Policy, our Terms of Use, all amendments, addenda, and licenses to the Privacy Policy and Terms of Use, and all applicable Hill 17 rules and policies (collectively, the “Agreement”). We also assume that you consent to Hill 17’s use of your information and data as described in the Agreement. If you do not consent, you should Generally, there are three categories of people using, or interacting with, the Site and Services:

- “**Publishers**” are individuals or organizations who are accessing and/or using the Services to create Hill 17 tokens on their own web site(s) or platform(s) (e.g., Publisher Site(s)).
- “**Hill 17 Auditors**” are individuals or organizations who have received data from another party with a Hill 17 token present and desire to verify the authenticity of the Hill 17 token and the other data they received by performing a Hill 17 Audit on the Hill 17 token.
- “**End Users (of Publisher Sites)**” are individuals who visit and interact with Publisher Sites by, for example, entering information into forms on Publisher Sites.

This Privacy Policy applies to Publishers, Hill 17 Auditors, and End Users, as defined above. If you are a Publisher and/or a Hill 17 Auditor, by visiting the Site or utilizing the Services, you are accepting the policies and practices described in this Privacy Policy. If you are a Publisher and/or a Hill 17 Auditor, you also agree that you maintain privacy policies on your Publisher Sites or company websites that are consistent with our Privacy Policy regarding the collection, use, sharing, and protection of information provided by End Users to your Publisher Sites. If you are an End User of Publisher Sites which use Hill 17 Services, this Privacy Policy is provided to let you know what (and how) information that you voluntarily provide on Publisher Sites is collected and how we protect it, use it, and share it.

This Privacy Policy applies only to the Hill 17 Site and Hill 17 Services. This Privacy Policy does NOT apply to the collection, use, sharing, or protection of information by parties (including Publishers and Hill 17 Auditors) independent of such parties’ use of the Hill 17 Services or to



any websites managed, maintained, and/or hosted by parties not directly affiliated with Hill 17. Hill 17 does not control the privacy policies of other websites. We encourage you to learn more about the online privacy and data security policies of third party websites directly from such third parties, as their policies may differ from ours.

## A. Privacy Practices for Publishers and Hill 17 Auditors

For clarity, this section applies only to Publishers and Hill 17 Auditors utilizing the Services through the Site, not to End Users of Publisher Sites. For more information on privacy practices regarding End Users of Publisher Sites, please see the next section (“Privacy Practices for End Users Who Visit Publisher Sites”).

1. Information collection. When you (as a Publisher or a Hill 17 Auditor) access the Site, there are several sections where you may voluntarily enter information that may be used to identify or locate you, such as your full name, postal address, e-mail address, phone number, Facebook ID, Twitter ID, or billing information, as well as other non-public information that is associated with this information (“Hill 17 Member Personally Identifiable Information” or “Hill 17 Member PII”). We will collect Hill 17 Member PII only when you knowingly provide it, including when you register for the Site, provide feedback, or request information. We use your Hill 17 Member PII to administer your account and provide you the Services, to send communications and administrative emails, to respond to your inquiries, and to send marketing and product update messages to those who ask for such messages. Typically, individuals acting on behalf of a Publisher and/or Hill 17 Auditor would be the only individuals to provide this type of information on the Site in order to access and register for the Services (for example, Publishers may provide their email address when they register on the Site and create a username and password).
2. Information sharing. When you use the Hill 17 Audit Services, your Hill 17 Member PII captured through the Site may be shared, since some of the requested information may include Hill 17 Member PII that is associated with the information within your account, such as your company's name.

Controlling Hill 17 Member PII. If you have provided Hill 17 Member PII, such as your email address when registering for our Site, you may modify that information at any time by visiting your account settings on our Site. You can opt out of receiving certain email communications from the Site by clicking the “Unsubscribe” link at the bottom of each email, or through a similar opt out link that may be provided. You can delete your account at any time.



## B. Privacy Practices for Publishers and Hill 17 Auditors

For clarity, this section applies only to End Users who visit Publisher Sites that are utilizing Hill 17 Services.

1. Information collection. Many Publisher Sites utilize Hill 17 Services. When an End User visits, enters information into, or otherwise interacts with, a Publisher Site, the technology associated with our Services (previously installed at a Publisher Site with that Publisher's approval) capture certain information and automatically create and return to the Publisher a unique identifier known as a Hill 17 token. The Services may use various technologies to do this, including JavaScript®, website scripts, pixel tags, cookies, local storage, and device identification. The information associated with a Hill 17 is anonymous and subject to confidentiality obligations at all times. If an End User enters information into open text fields within a form on a Publisher Site, our Services consider this information as potential personally identifiable information ("PII") and automatically encrypts that information using a cryptographic hash function which makes it infeasible for anyone, including us, to store, retrieve, reverse-engineer, or utilize the PII that was volunteered by the End User. The only information from an End User that a Hill 17 Auditor or Publisher may directly gain from utilizing our Services is anonymous, non-personally identifiable information ("Non-PII"). In addition, the provision of our Services may facilitate the capture of other Non-PII through the Publisher Site at the time an End User visits a Publisher Site, including the End User's Internet Protocol (IP) address, browser type, browser language and the date and time that web page was visited, as well as other Non-PII.
2. Information sharing.
  - a. We share anonymous, Non-PII only as necessary to enable us to provide our Services to Hill 17 Auditors who wish to certify that a certain event(s) took place at the Publisher Site in which an End User legitimately participated and to ensure that the data was not tampered with as it was transmitted to other companies.
  - b. For certain third-party companies who may work with us to provide certain services through our Site that are supplemental to our Services, we may be requested to share certain information (including PII captured on a Publisher Site prior to it being encrypted, as referenced above) with those third-party companies to provide the requested results. Such third-party companies are bound by obligations to (i) keep the information confidential, (ii) utilize it only for the purpose as required to provide certain requested services, and (iii) utilize it to derive requested information that is Non-PII. Such derived Non-PII may be provided to Hill 17 Auditors as part of our Services or supplemental services provided by third-party companies. Once any PII is shared with a third-party



company, the PII is automatically and immediately encrypted, as referenced above, and only the hash values are retained.

- c. A Hill 17 Auditor may provide certain End User information when performing a Hill 17 Audit that the Hill 17 Auditor believes to be associated with a certain Hill 17 (“Contributed Data”). We do not require any Contributed Data to be provided as part of the Services. If any Contributed Data is provided by the Hill 17 Auditor as part of a Hill 17 Audit, this information is utilized solely to return back data values and flags, rules and actions that are associated with that Hill 17 Audit request.
3. Controlling End User information. If an End User does not want us to store his or her information, the End User can opt-out by not visiting Publisher Sites that utilize the Services. Publishers may also request that we not capture or use certain information captured during an event on their Publisher Sites. Please consult the privacy policy of the Publisher Site(s) you visit for more information.

## ADDITIONAL DISCLOSURE

We may also share information:

1. If we have a good faith belief that disclosure of such information is reasonably necessary to (a) satisfy applicable law, regulation, legal process, or an enforceable governmental request, (b) enforce the Agreement, including investigation of associated potential violations, (c) detect, prevent, or otherwise address fraud, security, or technical issues, or (d) protect against harm to the rights, property, or safety of Hill 17, Hill 17 Auditors, Publishers, End Users, or the public as required or permitted by law.
2. In the event we go through a business transition such as a merger or acquisition by another company, or sale of all or a portion of our assets, as we expect that information will be among the assets transferred.
3. To aggregate End User Non-PII with the Non-PII of others for reporting and analytics without restriction.

## INFORMATION SECURITY AND RETENTION

We take security measures to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of data. These include firewalls and encryption, internal reviews of our data collection, storage and processing practices, and security measures, including restrictions of access and obligations of confidentiality, as well as physical security measures to guard against unauthorized access to systems.



However, we are unable to guarantee that the security measures we take will not be penetrated or compromised or that information will remain secure under all circumstances. We retain information we capture through the Services indefinitely or as required by applicable law.

## CHILDREN

We do not knowingly collect or maintain information from individuals who are under 13 years of age, and no part of our Site or Services is designed to attract people under the age of 13. Protecting the privacy of children is very important to us. If we obtain knowledge that a Hill 17 Member or End User is under the age of 13, we will take steps to remove that individual's information from our databases.

## ONLINE TRACKING (pursuant to the California Online Privacy Protection Act (CalOPPA))

As described, our Services operate and are provided principally online through Publisher Sites and our Site; and based on specific parameters and criteria set by the Publishers and/or Hill 17 Auditors requesting our Services. We do not disclose any do-not-track signals an End User's browser may send while visiting a Publisher Site without prior approval from Publishers and/or Hill 17 Auditors requesting our Services. Please rely on the privacy policies of any Publisher Sites you visit for their practices and policies regarding this subject.

## LINKS TO OTHER SITES

Our Site and Services provide services to third-party websites and services. The fact that we provide Services to these entities is not an endorsement, authorization, or representation that we are affiliated with that third party, nor is it an endorsement of their privacy or information security policies or practices. This Privacy Policy applies only as provided in the "Scope" section above. Other websites and services follow different rules regarding the use or disclosure of personal information. We encourage you to read the privacy policies or statements of the other websites you visit and especially those where you provide your PII to them.

## INTERNATIONAL USERS

The Site and Services are hosted in the United States. If you access the Site or Services from the European Union, Asia, or any other region with laws or regulations governing personal data collection, use, sharing, and protection that differ from United States laws, please be advised that through your continued use of the Site or Services, you are transferring your PII to the United States and you consent to that transfer.

Additionally, you understand that your PII may be processed in countries (including the United States) where laws regarding processing PII may be less stringent than in your country.



## CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may change from time to time. We will notify you of any material changes by posting the new Privacy Policy on the Site. All information Hill 17 captures, gathers and processes is and will be subject to the Privacy Policy in effect at the time the information is made available.

## QUESTIONS OR COMMENTS

Please feel free to direct any questions or comments regarding this Privacy Policy by emailing us at [support@hill17.com](mailto:support@hill17.com), or writing to us at: Hill 17 Solutions., 107 Gilbreth Parkway, Mullica Hill, NJ 08062, ATTN: Privacy Policy.