

# MIME, Inc. Privacy Policy

**Effective Date: October 07, 2020**

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## Introduction

MIME, Inc. (collectively referred to herein as “MIME”, “we”, “our” or “us”), recognizes the importance of protecting personal data we may collect from visitors and any other individual or entity (“Users”, “you”, or “your”) who visit our web sites. This Privacy Policy applies to data collection by MIME and shall apply to your use of the website, [www.getmime.com](http://www.getmime.com) and other MIME-related sites, applications, including the Flawless by MIME mobile application, software, communications, capabilities and services (“Services”) accessible on or by any top-level MIME domain owned by us (each, a “Site” and collectively the “Sites”), but excluding services that state that they are offered under a different privacy policy.

Our Privacy Policy explains: (1) what information we collect; (2) why we collect it; (3) how we use that information; (4) how we may share it; (5) the choices we offer, including how to access and update information; (6) and the measures we take to keep your information safe. Specifically, our Privacy Policy covers the following topics:

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Please familiarize yourself with our privacy practices and let us know if you have any questions. By using the Sites, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Sites.

Irrespective of which country you live in, you authorize us to transfer, store, and use your information in the United States, and any other country where we operate. In some of these countries, the privacy and data protection laws and rules regarding when government authorities may access data may vary from those in the country where you live. Learn more about our data transfer operations in the “International

Transfer” section below. If you do not agree to the transfer, storage and use of your information in the United States, and any other country where we operate, please do not use the Sites or Services.

If you have any questions or comments about this Privacy Policy, please submit a request to [privacy@getmime.com](mailto:privacy@getmime.com).

### **When this Privacy Policy Applies**

Our Privacy Policy applies to all of the Services offered by MIME and its affiliates, including some MIME partners, and Services offered on other sites, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you, or other sites linked from our Services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our Services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

### **Terms of Use**

By accessing or using the Sites in any manner, you also agree to be bound by MIME’s Terms of Use (the “Agreement”). Please read the Agreement carefully. If you do not accept all of the terms and conditions contained in or incorporated by reference into the Agreement, please do not use the Sites.

### **Information We Collect**

We collect information, including personal data, to provide better services to all our Users. We use the term “Personal Data” to refer to any information that identifies or can be used to identify you. Common examples of Personal Data include: full name, email address, digital identity, such as a login name or handle, information about your device, and certain metadata.

“Sensitive Personal Data” refers to a smaller subset of Personal Data which is considered more sensitive to the individual, such as race and ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric information, physical or mental health information, medical insurance data, or sexual orientation.

When you use our Services, we collect Personal Data in the following ways:

1. Information You Give to Us

- Website

You may choose to provide us with Personal Data about yourself, including your name, organization name, title, address, phone number, and email address by completing forms on our website or emailing us, such as when you request information about our Services.

In some instances, you may elect to provide us with location and address information. You may also provide us with Personal Data about yourself when you report a problem or have a question about our services.

The Sites offer interactive and social features that permit you to submit content and communicate with us. You may provide Personal Data to us when you post information in these interactive and social features. Please note that your postings in these areas of the Sites may be publicly accessible or accessible to other Users.

- **Mobile Applications**

Certain information is required when creating an account to use our Services on the mobile application, such as your name, email address, birth date, User name and password. If you elect to create an account using Facebook, we will require your Facebook username and/or Facebook ID.

In addition, in order to use the Services, you may choose to provide additional information such as your personal characteristics, including skin tone and type, skin concerns, hair color and type, hair concerns, eye color, age range, photographs, videos and product reviews.

In connection with the use of the Services, your mobile device may collect certain data points like your IP address and mobile device ID. When your device syncs with MIME's application, certain data recorded on your device is transferred from your device to our servers.

## 2. Information We Obtain from Your Use of Our Services

We collect certain information automatically, such as your operating system version, browser type, and internet service provider. We also collect information about your interaction with the Services, such as creating or logging into your account, or opening or interacting with the Services on Your mobile device. When you use our Site, we automatically collect and store this information in service logs. This includes: details of how you used our Site; Internet protocol address; cookies that uniquely identify your browser, the referring web page and pages visited. We may also collect and process information about your actual location. The information we collect automatically is statistical data and may or may not include Personal Data, but we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties.

- **Location Data**

If you grant us access to your location, MIME may collect information about your location when you use our Sites and Services. Your location can be determined by: GPS, IP address, and information about things near your device, such as Wi-Fi access points and cell towers. When you use our Services via a wireless device, we may solicit your permission to collect your location data. Some features within our application may only function upon confirmation of your location, and therefore such features will not be available if you choose not to provide your location data to us. The specificity of the location data collected may depend on a number of factors, including the device you are using (e.g. laptop, smartphone or tablet) and how you are connected to the Internet (e.g., via cable broadband connection, WiFi). If you enable location services for our mobile application, we may collect location data periodically as you use or leave open our mobile application. We may associate such location data with Personal Data you provide to us. Depending on the platform you use to access our mobile application (e.g., Apple's iOS, Google's Android), you may

be able to control whether location data is collected from within “Settings” or other controls on your wireless device or the mobile application.

- Device ID

When using our Services, we or our service provider may collect your unique device ID. We may use such information for internal purposes and to provide you a better experience, such as to troubleshoot application problems you may experience. We may associate device ID with personal information you provide to us. You may learn more about opt out of any anonymous device ID collection via the privacy settings available within your mobile device.

### 3. MIME Partners

We may partner with third parties, such as retail stores, that offer MIME Services to their customers. In such cases, those companies may provide us with your name, email address, similar information and other personal information so that we can provide you with our Services.

### 4. Cookies and Similar Technologies

We and our partners use various technologies to collect and store information when you visit one of our services, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to collect and store information when you interact with services from our partners, such as advertising services. Our third party advertising and analytics partners include Google, Parse Analytics, MixPanel and similar partners.

The technologies we use for this automatic data collection may include:

Cookies. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our services. For more information about our use of cookies, including details on how to opt-out of certain cookies, please see our **Cookie Policy**.

Web Beacons. Pages of our services or our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count Users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Clickstream Data. Clickstream data is information collected by our computers when you request Web pages from the Sites. Clickstream data may include information such as the page served, the time spent viewing the page, source of the request, type of browser making the request, the preceding page viewed and similar information. Clickstream data permits us to analyze how visitors arrive at the Sites, what type of content is popular, what type of visitors in the aggregate are interested in particular kinds of content on the Sites.

## 5. Advertising

We share certain data with third parties to allow us to target existing Users and customers with highly relevant advertising campaigns.

### **How We Use Information We Collect**

We use your Personal Data in ways that are compatible with the purposes for which it was collected or authorized by you, including for the following purposes:

1. To present, operate or improve the Site and Services, including analysis of Site activity;
2. To inform you about Services and products available from MIME;
3. To authorize access to our Sites and Services;
4. To provide, maintain, administer or expand the Services, performing business analyses, or for other internal purposes to support, improve or enhance our business, the Services, and other products and services we offer;
5. To offer and administer programs;
6. To customize or tailor your experience of the Services;
7. To administer content, promotion, sweepstakes, surveys, voting polls or other Site features;
8. To communicate about, and administer your participation in, special programs, surveys, contests, online campaigns, online programs, sweepstakes, and other offers or promotions, and to deliver pertinent emails;
9. To improve our Site and Services;
10. To secure our Services, including to authenticate Users;
11. To use statistical information that we collect in any way permitted by law, including from third parties in connection with their commercial and marketing efforts;
12. To use anonymized and aggregated information, including sharing anonymized and aggregated information with third parties to use for their own purposes;
13. To respond to and support Users regarding their use of the Sites and Services;
14. To comply with all applicable legal requirements;
15. To enforce our Terms of Use and other agreements;
16. To perform data analysis and testing;
17. To investigate possible fraud or other violations of our Terms of Use or this Privacy Policy and/or attempts to harm our Users;
18. To resolve disputes;
19. To otherwise fulfill the purpose for which the information was provided;
20. To send you marketing information and other non-transactional communications via email, telephone calls, SMS, or push notifications about us as necessary for our legitimate interest in conducting direct marketing or to the extent that you have provided prior consent.

We use the information we collect from our Sites to provide, maintain, and improve them, to develop new services, and to protect our company and our Users.

We use information collected from cookies and other technologies, to improve your User experience and the overall quality of our services. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. We may use your Personal Data to see which web pages you visit at our Site, which web site you visited before coming to our Site, and where you go after you leave our Site. We can then develop statistics that help us understand how our visitors use our Site and

how to improve it. We may also use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

## **Our Legal Basis for Collecting Personal Data**

Whenever we collect Personal Data from you, we may do so on the following legal bases:

1. Your consent to such collection and use;
2. Out of necessity for the performance of an agreement between us and you, such as your agreement to use our Services or your request for Services;
3. Our legitimate business interest, including but not limited to the following circumstances where collecting or using Personal Data is necessary for:
  - Intra-organization transfers for administrative purposes;
  - Product development and enhancement, where the processing enables MIME to enhance, modify, personalize, or otherwise improve our services and communications for the benefit of our Users, and to better understand how people interact with our Sites;
  - Communications and marketing, including processing data for direct marketing purposes, and subject to your opt-in for these purposes, and to determine the effectiveness of our promotional campaigns and advertising;
  - Fraud detection and prevention;
  - Enhancement of our cybersecurity, including improving the security of our network and information systems; and
  - General business operations and diligence;

Provided that, in each circumstance, we will weigh the necessity of our processing for the purpose against your privacy and confidentiality interests, including taking into account your reasonable expectations, the impact of processing, and any safeguards which are or could be put in place. In all circumstances, we will limit such processing for our legitimate business interest to what is necessary for its purposes.

## **Information We Share**

We do not share personal data with companies, organizations and individuals outside of MIME unless one of the following circumstances applies:

- **With your consent.** We will share Personal Data with companies, organizations or individuals outside of MIME when we have your consent to do so.
- **Corporate Affiliates.** MIME may share certain personal information with its affiliates (including parent company, sister companies and subsidiaries.)
- **Behavioral Information.** We may share behavioral information (including personal information and usage data) that we have collected about you in accordance with this Privacy Policy with our third party advertising partners, to permit such third parties to deliver advertisements when you visit other websites or mobile applications. This information is used to tailor online advertisements to your perceived interests (based on the behavioral information collected about you) and to provide advertising-related services such as reporting, attribution, analytics,

and market research. You may be able to stop receipt of advertising in accordance with DAA and NAI opt-out mechanisms, as further described in the “Your Online Ad Choices” section of this Privacy Policy.

- **Enterprise Accounts.** Your employer or your organization may offer you access to our Services. We will share Personal Data with your employer or organization. Your employer or organization can review and manage your use of such enterprise Services.
- **For external processing.** We provide personal information to our affiliates or other trusted businesses or partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. These third parties include marketing partners, third party hosted services providers, and similar partners. It is our policy to only share Personal Data with contractors, service providers and other third parties who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. Under certain circumstances, you may avoid having us share your information with our business partners and vendors by not granting us permission to share your information. Not granting us permission to share your information with our business partners or vendors may limit your access to their services through the Sites.
- **Joint Marketing Partners.** We may share your personal information with third parties that we have partnered with to jointly create and offer a product or service. These joint marketing partners may only use this information to market products and services to you. Additionally, to the extent permitted by law, MIME’s joint marketing partners may share your personal information with us to better serve you.
- **For Legal Reasons.** We will share Personal Data with companies, organizations or individuals outside of MIME 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 Use or Services Agreement, including investigation of potential violations.
  - detect, prevent, or otherwise address fraud, security or technical issues.
  - protect against harm to the rights, property or safety of MIME, our Users or the public as required or permitted by law.

We attempt to notify Users about legal demands for their Personal Data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

- **Business Transfers.** If we establish a new related entity, are acquired by or merged with another organization, or if substantially all of our assets are transferred to another organization, Personal Data about our Users is often a transferred business asset. In the event that MIME itself or substantially all of our assets are acquired, Personal Data about our Users may be one of the transferred assets.
- **Non-Personal and Aggregate Site Use Information.** MIME may compile and share your information in aggregated form (i.e., in a manner that would not personally identify you) or in de-identified form so that it cannot reasonably be used to identify an individual (“De-Identified Information”). We may disclose such de-identified information publicly and to third parties, or to MIME Partners under agreement with us. MIME may also disclose De-Identified Information for general research purposes and in research collaborations with third parties. MIME may also use De-Identified Information for commercial collaborations with private companies for purposes such as product design or enhancement of Services.

## **Your Failure to Provide Personal Data**

Your provision of Personal Data is required in order to use certain parts of our services and our programs. If you fail to provide such Personal Data, you may not be able to access and use our Services and/or our programs, or parts of our Services and/or our programs.

## **Our Retention of Your Personal Data**

We may retain your Personal Data for a period of time consistent with the original purpose for collection. For example, we keep your Personal Data for no longer than reasonably necessary for your use of our programs and Services and for a reasonable period of time afterward. We also may retain your Personal Data during the period of time needed for us to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

We retain your Personal Data even after your business relationship with us ends if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our Terms of Use, or fulfill your request to “unsubscribe” from further messages from us. We will retain de-personalized information after your account has been closed.

## **Your Choices and Accessing, Updating or Deleting Your Personal Data**

Whenever you use our Services, we aim to provide you with choices about how we use your Personal Data. We also aim to provide you with access to your Personal Data. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. Subject to applicable law, you may obtain a copy of personal information we maintain about you or you may update or correct inaccuracies in that information by contacting us. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that personal information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the How to Contact Us section below.

- **Your Rights With Respect to Personal Data**

Some data protection laws, including the European Union’s General Data Protection Regulation (“GDPR”), corresponding legislation in Switzerland and in the United Kingdom, and some U.S. state laws, provide you with certain rights in connection with Personal Data you have shared with us. If you are resident in the European Economic Area, you may have the following rights:

1. **The right to be informed.** You are entitled to be informed of the use of your Personal Data. This Privacy Policy provides such information to you.
2. **The right of access.** You have the right to request a copy of your Personal Data which we hold about you.
3. **The right of correction:** You have the right to request correction or changes of your Personal Data if it is found to be inaccurate or out of date.



4. **The right to be forgotten:** You have the right to request us, at any time, to delete your Personal Data from our servers and to erase your Personal Data when it is no longer necessary for us to retain such data. Note, however, that deletion of your Personal Data will likely impact your ability to use our services.
5. **The right to object (opt-out):** You have the right to opt-out of certain uses of your Personal Data at any time.
6. **The right to data portability:** You have the right to a “portable” copy of your Personal Data that you have submitted to us. Generally, this means your right to request that we move, copy or transmit your Personal Data stored on our servers / IT environment to another service provider’s servers / IT environment.
7. **The right to refuse to be subjected to automated decision making, including profiling:** You have the right not to be subject to a decision and insist on human intervention if the decision is based on automated processing and produces a legal effect or a similarly significant effect on you.
8. **The right to lodge a complaint with a supervisory authority.**

You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law. To make these requests, you may contact us using the contact information below, and we will consider your request in accordance with applicable laws. For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. If we no longer need to process Personal Data about you in order to provide our Services or our Sites, we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.

In some cases our ability to uphold these rights for you may depend upon our obligations to process personal information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

- **Changing or Deleting Your Information**

You may update or correct information about yourself by making changes to your profile in your account or by emailing us at [privacy@getmime.com](mailto:privacy@getmime.com). If you completely delete all such information, then your account may become deactivated. We may retain an archived copy of your records as required by law, to comply with our legal obligations, to resolve disputes, to enforce our agreements or for other legitimate business purposes.

We may contact you to request that you update your Personal Data on a regular basis to ensure its integrity for the purposes of ongoing data management.

- **Our Opt-in/Opt-out Policy**

By providing an email address on the MIME Sites or Services, you agree that we may contact you in the

event of a change in this Privacy Policy, to provide you with any Service related notices, or to provide you with information about our events, invitations, or related educational information.

For purposes of this Privacy Policy, “opt-in” is generally defined as any affirmative action by a User to submit or receive information, as the case may be.

We currently provide the following opt-out opportunities:

1. At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us or a MIME Partner to unsubscribe from the service.
2. At any time, you can contact us through [privacy@getmime.com](mailto:privacy@getmime.com) or the address or telephone number provided below to unsubscribe from the service and opt-out of our right per your consent under the terms of this Privacy Policy to share your Personal Data.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service related notices.

- **Your Online Ad Choices**

You may find more information about entities involved in online advertising and additional choices you may make, including opt-out of having your information used for internet-based advertising, through the Network Advertising Initiative (“NAI”) at the NAI Service, and the Digital Advertising Alliance (the “DAA”) at the DAA consumer choice service. MIME is a participant in the online industry’s self-regulatory program administered by the DAA and has agreed to adhere to the DAA’s principles applicable to interest-based ads.

The tools provided at the DAA opt-out page and the NAI opt-out page are provided by third parties, not MIME. MIME does not control or operate these tools or the choices that advertisers and others provide through these tools.

### **Third Party Links**

The Sites may contain links to webpages operated by parties other than MIME. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to the User to take precautions to ensure that whatever links the User selects or software the User downloads (whether from this Site or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which the User will be subject to upon linking to the third party's website. MIME strongly recommends that each User review the third party's terms and policies.

### **International Transfer**

We are committed to complying with applicable laws, regulations and mandatory government standards regarding the protection of Personal Data.

Personal Data and any additional information submitted may be used globally in connection with employment, business processes within MIME, or communicating with our MIME Partners. Therefore, Personal Data may be transferred to such entities worldwide, where it will be processed in accordance with this Privacy Policy and laws that are applicable in each country. Countries where we process data may have laws which are different, and potentially not as protective, as the laws of your own country.

If we transfer your Personal Data out of your jurisdiction, we will implement suitable safeguards and rely on legally-provided mechanisms to lawfully transfer data across borders to ensure that your Personal Data is protected.

### **How We Protect Personal Data**

MIME maintains administrative, technical and physical safeguards designed to protect the User's Personal Data and information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, taking into account technological reality, cost, the scope, context and purposes of processing weighted against the severity and likelihood that the processing could threaten individual rights and freedoms. For example, we restrict access to personal information to MIME employees, contractors, business partners and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations. We use commercially reasonable security measures such as encryption, firewalls, and Secure Socket Layer software (SSL) or hypertext transfer protocol secure (HTTPS) to protect Personal Data.

If MIME collects account information for payment or credit, MIME will use the information only to complete the task for which the account information was offered.

### **Children**

The Site is not intended for use by children. We do not intentionally gather Personal Data about United States visitors who are under the age of 13 or about European Union, United Kingdom or Swiss visitors who are under the age of 16. If a child has provided us with Personal Data, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under the ages of 13 or 16 in the applicable jurisdictions, please contact us at [privacy@getmime.com](mailto:privacy@getmime.com). If we learn that we have inadvertently collected the personal information of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

### **Direct Marketing and “Do Not Track” Signals**

MIME does not track its users over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser may include controls to block and delete cookies, web beacons and similar technologies, to allow you to opt out of data collection through those technologies.

California residents are entitled to contact us to request information about whether we have disclosed Personal Data to third parties for the third parties' direct marketing purposes. Under the California "Shine the Light" law, California residents may opt-out of our disclosure of Personal Data to third parties for their direct marketing purposes. You may choose to opt-out of the sharing of your Personal Data with third parties for marketing purposes at any time by submitting a request to [privacy@getmime.com](mailto:privacy@getmime.com). California users may request further information about our compliance with this law by contacting us at [privacy@getmime.com](mailto:privacy@getmime.com) or by writing to us at the address listed in the "How to Contact Us" section.

## **MIME Partners**

MIME customers ("MIME Partners") engage us to deliver Services to their employees, customers and other users. Partner Information, Information about our Partner's Contacts and Archival Information (each defined below) are governed by this Privacy Policy, the MIME Terms of Use and any other Services agreements between MIME and the applicable Partner.

- **MIME Partner Information.** We collect information about individuals within our MIME Partners organization ("Partner Information"). Partner Information may include information related to the Partner's account, name, work e-mail address, work phone number, job title or similar kinds of information. We use Partner Information to support the Partner account, maintain our business relationship with the Partner, respond to Partner inquiries, or perform accounting functions. MIME Partners may update personal information and password by logging into the MIME Platform and updating their account. MIME Partners may contact MIME support in order to delete their Personal Data. In some cases, we may not be able to delete Partner Information, and in such cases we will tell you why.
- **Information about our Partners' Contacts.** We collect information about any contacts, such as employees, customers, and others, that may be uploaded into the MIME Platform ("Information about our Partners' Contacts"). Information about our Partner's Contacts may include name, e-mail address, phone number, job title, or similar kinds of information. We use Information about our Partner's Contacts for the purposes of providing Services to such contacts. MIME Partners may update or delete Information about their contacts in the MIME Platform. MIME Partners may also contact MIME support in order to update and delete such information. In some cases, we may not be able to delete such information, and in such cases we will tell you why.
- **Archival Information.** We collect communications information for archival purposes on behalf of, and as directed by, our MIME Partners. This information may include emails, texts, websites, social media messages or posts, and other forms of data or electronic communications ("Archival Information"). Archival Information includes data about our MIME Partners and the third parties they correspond with. We do not control or monitor the information our MIME Partners collect and store through our services, or their privacy practices or policies. It is our Partner's obligation to obtain all necessary consents and to comply with all applicable laws with respect to the Partner's communications and use of our services. Our Partner's privacy policies or practices apply to Archival Information, the purposes for which the Partner collects Archival Information, how the Partner may use Archival Information and what choices the individual may have with respect to Archival Information. Individuals must contact the applicable Partner in order to correct, amend, or delete their information, or to opt out of any collection, uses or disclosure of their information by our Partner.

- **Automatically Collected Information.** We collect information automatically about how our MIME Partners use our services (“Automatically Collected Information”). We do this via data collection technologies such as cookies, web beacons, gifs or other tracking technologies. We collect this information in order to monitor, support and improve our services or to provide MIME Partners with certain customized features. We may use Automatically Collected Information to tell us how our MIME Partners use our services, to improve our services or develop new products, services or features. We may combine this information with other information we collect.

We treat Partner Information, Information about our Partner’s Contacts, Archival Information and Automatically Collected Information as the confidential and proprietary information of our MIME Partners, subject to the terms of the MIME Terms of Use and any other service agreement between MIME and the Partner. We do not share Partner Information, Information about our Partner’s Contacts, Archival Information or Automatically Collected Information with third parties unless directed to do so by our Partner, as may be necessary to provide services to the Partner, to our advisors, affiliates, representatives, agents, service providers, in connection with a business transaction (such as a merger or sale), as allowed under the terms of our agreement with our Partner, or in response to a court order, subpoena, warrant or to comply with a legal requirement or to cooperate with an investigation. We may disclose Partner Information, Information about our Partner’s Contacts, Archival Information or Automatically Collected Information for the aforementioned reasons, or in order to protect our rights or the rights of our affiliates, MIME Partners, channel partners or service providers.

We will retain Partner Information we process on behalf of our MIME Partners for as long as needed to provide Services to our Partner, or for the period of time requested by a particular Partner.

### **Changes to this 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 or programs, email notification or privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

Revisions:

- October 07, 2020

### **How to Contact Us**

If you have any specific questions about this Privacy Policy, you can contact us via email or phone or by writing to us at the address below:

Send e-mail to: [privacy@getmime.com](mailto:privacy@getmime.com)

Send mail to our address:

MIME, Inc.

Attn: Privacy Policy Inquiry  
915 Broadway Street  
Suite 112  
Vancouver, WA 98660  
United States of America