

Effective Date: November, 2023

This Privacy Policy describes how Lightkeeper, LLC (“Lightkeeper”, “we”, “us”, or “our”) handles personal information that we collect through our website or through any other website or service that we own or control and which links to this Privacy Policy (collectively, the “Services”).

We treat all personal information covered by this Privacy Policy as pertaining to individuals acting as business representatives, and not in their individual or household capacity.

PERSONAL INFORMATION WE COLLECT

Information you submit to us:

- **Contact information**, such as your first and last name, phone number, email address, company name, and professional title.
- **Feedback or correspondence**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us online.
- **Marketing information**, such as your preferences for receiving communications about our Services, and details about how you engage with our communications.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Information we obtain from other sources:

- **Social media information.** We may maintain pages on social media platforms, such as LinkedIn. When you visit or interact with our pages on those platforms, you or the platforms may provide us with information through the platform.
- **Other sources.** We may obtain personal information from other third parties, such as marketing partners, publicly-available sources, and data providers.

Automatic data collection. We and our service providers may automatically log information about you, your computer or mobile device, and your interactions over time with our Services, our communications and other online services, such as:

- **Device data**, such as your computer’s or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 4G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, browsing history, navigation paths between pages or screens, information about your activity on a page or screen, access times, duration of access, and whether you have opened our marketing emails or clicked links within them.



We use the following tools for automatic data collection:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand website user activity and patterns. We may use Google Analytics, a web analytics service provided by Google to help collect and analyze online activity data. For more information on how Google uses this information, click [here](#).
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

HOW WE USE YOUR PERSONAL INFORMATION

We use personal information for the following purposes:

Provide our Services. We use personal information to operate, maintain, and provide you with our Services.

Communicate with you about our Services, including by sending you announcements, updates, security alerts, and support and administrative messages.

Improve, monitor, and personalize the Services, including by understanding your needs and interests, and personalizing your experience with the Services and our communications.

For research and development. We may use your personal information for research and development purposes, including to analyze and improve our Services and our business. As part of these activities, we may create aggregated, de-identified, or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and disclose it to third parties for our lawful business purposes, including to analyze and improve our Services and promote our business.

Direct marketing. We may from time-to-time send you direct marketing communications as permitted by law, including, but not limited to, notifying you of special promotions, offers and events via email. You may opt out of our marketing communications as described in the "Opt out of marketing communications" section below.

Compliance and protection. We may use personal information to:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.
- Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims).
- Audit our internal processes for compliance with legal and contractual requirements and internal policies.
- Enforce the terms and conditions that govern our Services.
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

How we disclose your personal information

Affiliates. We may disclose your personal information to our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.



Service providers. We may disclose your personal information to third party companies and individuals that provide services on our behalf or help us operate our Services (such as lawyers, bankers, auditors, insurers, customer support, hosting, analytics, email delivery, marketing, and database management).

Authorities and others. We may disclose your personal information to law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

Business transfers. We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution. In such a case, we will make reasonable efforts to require the recipient to honor this Privacy Policy.

YOUR CHOICES

Opt out of marketing communications. You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing emails.

Personal information requests. We offer you choices that affect how we handle your personal information. Depending on your location and the nature of your interactions with our Services, you may request the following in relation to your personal information:

- **Information** about how we have collected and used your personal information. We have made this information available to you without having to request it by including it in this Privacy Policy.
- **Access** to a copy of the personal information that we have collected about you. Where applicable, we will provide the information in a portable, machine-readable, readily-usable format.
- **Correction** of personal information that is inaccurate or out of date.
- **Deletion** of personal information that we no longer need to provide the Services or for other lawful purposes.
- **Withdrawal** of consent, where applicable.
- **Opt out** of the sale of your information or sharing of your information for interest-based advertising. However, we do not sell your information or share it for interest-based advertising.
- **Additional rights**, such as the rights to **object** to and request that we **restrict** our use of personal information.

To make a request, please email or write to us as provided in the “How to Contact Us” section below. Prior to responding to your requests, we may verify your identity by matching any requested identifying information you provide against the information we have about you. Depending on your jurisdiction, you may designate an authorized agent to make a request on your behalf. We will require authorized agents to confirm their identity and authority, in accordance with applicable laws. You are entitled to exercise the rights described above free from discrimination.



Limits on your privacy rights and choices. In some instances, your choices may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights. If you are not satisfied with how we address your request, you may submit a complaint by contacting us as provided in the “How to Contact Us” section below. You may have the right to complain to a data protection regulator if you are not satisfied with how we handle your request.

Cookies. Most browser settings let you delete and reject cookies placed by websites. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, you may not be able to use all functionality of the Service and it may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org. You can also block our websites from setting cookies by using a browser with privacy features, like [Brave](#), or installing browser plugins like [Privacy Badger](#), [Ghostery](#), or [uBlock Origin](#), and configuring them to block third party cookies/trackers. You can also opt out of Google Analytics by downloading and installing the browser plug-in available at: <https://tools.google.com/dlpage/gaoptout>.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Other sites, mobile applications and services

Our Services may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third party websites, mobile applications or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and disclosure of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

Retention

We keep personal information for as long as reasonably necessary for the purposes described in this Privacy Policy, while we have a business need to do so, or as required by law (e.g. for tax, legal, accounting, or other purposes), whichever is longer.

Job Applicants

When you visit the careers portion of our websites, we collect the information that you provide to us in connection with your job application. This includes but is not limited to business and personal contact information, professional credentials and skills, educational and work history, and other information of the type that may be included in a resumé. This may also include diversity information that you voluntarily provide. We use this information to facilitate our recruitment activities and process employment applications, such as by evaluating a job candidate for an employment activity, to monitor recruitment statistics, and to respond to surveys. We may also use this information to provide improved administration of the Services and as otherwise necessary (i) to comply with relevant laws or to respond to subpoenas or warrants served on us, (ii) to protect and defend our or others’ rights or property, (iii) in connection with a legal investigation and (iv) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy or our terms.

Security

We employ a number of technical, organizational, and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe and we cannot guarantee the security of your personal information.



Children

The Services are not intended for use by children under 13 years of age. If we learn that we have collected personal information through the Services from a child under 13 without the consent of the child's parent or guardian as required by law, we will delete it.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the website.

How to contact us

Please direct any questions or comments about this Policy or our privacy practices by email to support@lightkeeperhq.com or at the following mailing address:

Lightkeeper
200 State Street, 12th Floor
Boston, MA 02109