



Measurabl, Inc. (“**Company**”) is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the Personal Data (as defined below) we collect from users of our website, located at *www.measurabl.com*, (the “**Site**”) and online services (“**Services**”).

1. Questions; Contacting Company; Reporting Violations. If you have any questions or concerns or complaints about our Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us at the following address or phone number:

Measurabl, Inc.
Attn: Measurabl Support
2150 W Washington St, Suite 308
San Diego CA, 92103
+1 619.719.1716

2. User Consent. By submitting Personal Data through our Site or Services, you agree to the terms of this Privacy Policy and you expressly consent to the collection, use and disclosure of your Personal Data in accordance with this Privacy Policy.

3. A Note to Users Outside of the United States. If you are a non U.S. user of the Site, by visiting the Site and providing us with data, you acknowledge and agree that your Personal Data may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Data may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of Personal Data may be less stringent than the laws in your country. By providing your data, you consent to such transfer.

For European Union users, please see our Privacy Shield Statement. If there is any conflict between the terms in Measurabl’s privacy policy and the [Privacy Shield Principles](#), the Privacy Shield Principles shall govern.

4. Types of Data We Collect. “**Personal Data**” means data that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data. “**Anonymous Data**” means data that is not associated with or linked to your Personal Data; Anonymous Data does not, by itself, permit the identification of individual persons. We collect Personal Data and Anonymous Data, as described below.

(a) Information You Provide to Us.

- We may collect Personal Data from you, such as your first and last name, gender, e-mail and mailing addresses, professional title, company name, and password when you create an account to log in to our network (“**Account**”).
- Our mobile homepage lets you store preferences like your location, safe search settings, and favorite widgets. We may associate these choices with your ID or the mobile device, and you can edit these preferences at any time on our mobile homepage.
- When connecting to our Services via a service provider that uniquely identifies your mobile device, we may receive this identification and use it to offer extended services and/or functionality.
- When you order services on our Site, we will collect all information necessary to complete the transaction, including your name, credit card information, billing information and shipping information. This information may be shared with third parties who help process and fulfill your purchases. When you submit credit card numbers, we encrypt that information using industry standard technology.
- We retain information on your behalf, such as files and messages that you store using your Account.
- If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.
- When you post content (text, images, photographs, messages, comments or any other kind of content that is not your e-mail address) on our Site, the information contained in your posting will be stored in our servers and other users will be able to see it, along with your profile photo and any other information that you choose to make public on your public profile page (“**Profile**”). The information that you provide in your Profile will be visible to others, including anonymous visitors to the Site.
- When you post messages on the message boards of our Site, the information contained in your posting will be stored on our servers and other users will be able to see it.
- When you participate in one of our surveys, we may collect additional profile information.
- We also collect other types of Personal Data that you provide to us voluntarily, such as your operating system and version, product registration number, and other requested information if you contact us via e-mail regarding support for the Services.
- When you link a third party service to your Account (as described below), we collect your login credentials for such third party service.
- We may also collect Personal Data, such as at other points in our Site that state that Personal Data is being collected.

(b) Information Collected via Third Party Services. The Services may allow users to link their Account with various third party services, including (i) third party services from which we import information and/or data, such as U.S. EPA’s Energy Star Portfolio Manager service, Hertz Rental Cars, AMEX Travel, Waste Management (each a “**Provider**”), and (ii) third party services with which we share reports (a “**Report**”) created via the Services, such as Global Real Estate Sustainability Benchmark, CDP, and The Global Reporting Initiative (as described below (each a “Standards Organization”). By linking with a Provider, you are allowing the Services to access your information and perform certain operations through the Provider on your behalf, and you are agreeing to the Provider’s terms of use in your use of the Services. We may receive information from a Provider and that information may be imported to the Site. Any information that we collect from a Provider may depend on the Provider’s privacy settings, so please consult the Provider’s privacy and data practices. You can edit privacy settings through the Provider, or disable the connection with the Provider by emailing support@measurabl.com.

(c) Information Collected via Technology.

- Information Collected by Our Servers. To make our Site and Services more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol (“**IP**”) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.
- Log Files. As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“**ISP**”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Site, track users’ movements around the Site, gather demographic information about our user base as a whole, and better tailor our Services to our users’ needs. For example, some of the information may be collected so that when you visit the Site or the Services again, it will recognize you and the information could then be used to serve advertisements and other information appropriate to your interests. Except as noted in this Privacy Policy, we do not link this automatically-collected data to Personal Data.
- Cookies. Like many online services, we use cookies to collect information. “**Cookies**” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. This type of information is collected to make the Site more

useful to you and to tailor the experience with us to meet your special interests and needs.

- Pixel Tags. In addition, we use “**Pixel Tags**” (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to Cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user’s computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user. We do not tie the information gathered by Pixel Tags to our users’ Personal Data.
- How We Respond to Do Not Track Signals. We do not currently respond to “do not track” signals or other mechanisms that might enable consumers to opt out of tracking on our Site.
- Mobile Services. We may also collect non-personal information from your mobile device if you have downloaded our Application(s). This information is generally used to help us deliver the most relevant information to you. Examples of information that may be collected and used include your geographic location, how you use the Application(s), and information about the type of device you use. In addition, in the event our Application(s) crash on your mobile device, we will receive information about your mobile device model software version and device carrier, which allows us to identify and fix bugs and otherwise improve the performance of our Application(s). This information is sent to us as aggregated information and is not traceable to any individual and cannot be used to identify an individual.
- Google Analytics. We use Google Analytics to help analyze how users use the Site. Google Analytics uses Cookies to collect information such as how often users visit the Site, what pages they visit, and what other sites they used prior to coming to the Site. We use the information we get from Google Analytics only to improve our Site and Services. Google Analytics collects only the IP address assigned to you on the date you visit the Site, rather than your name or other personally identifying information. We do not combine the information generated through the use of Google Analytics with your Personal Data. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Site, the Cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

(d) Information Collected from You About Others. You can invite users (up to the number permitted in your subscription) to access your Account by sending each invitee a URL. Such invitee will then be invited to create a sub-account under your Account (a “**Sub-Account**”) and we will collect information from such invitee necessary for the creation of the Sub Account, such as his or her first and last name, email address, password, and company name. We rely upon you to obtain whatever consents from the third party that may be required by law to allow us to access and upload the third party’s names and e-mail addresses as required above. You or the third party may contact us at support@measurabl.com to request the removal of this information from our database.

(e) Information Collected from Third Party Companies. We may receive Personal and/or Anonymous Data about you from companies that provide our Services by way of a co-branded or private-labeled website or companies that offer their products and/or services on our Site. These third party companies may supply us with Personal Data. We may add this information to the information we have already collected from you via our Site in order to improve the Services we provide.

5. Use of Your Personal Data

(a) General Use. In general, Personal Data you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your Personal Data in the following ways:

- to operate, maintain, and improve our Site and Services;
- to respond to comments and questions and provide customer service;
- to send information including confirmations, invoices, technical notices, updates security alerts, and support and administrative messages;
- to communicate about promotions, upcoming events, and other news about products and services offered by us and our selected partners;
- to link or combine user information with other personal information we get from third parties, to help understand your needs and provide you with better service;
- to analyze information imported to your Account and compare it against benchmarks;
- to create and submit Reports on your behalf;
- to provide you with recommendations to improve sustainability;
- to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity;
- to provide and deliver products and services customers request;
- to identify you as a user in our system;
- to facilitate the creation of and secure your Account on our network

- to process and deliver orders;
- to develop and improve marketing and advertising for the Services;
- send you a welcome e-mail to verify ownership of the e-mail address provided when your Account was created;
- send you administrative e-mail notifications, such as security, or support and maintenance advisories;
- make telephone calls to you, from time to time, as a part of secondary fraud protection or to solicit your feedback; and
- send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes of Company.

(b) User Testimonials and Feedback. We often receive testimonials and comments from users who have had positive experiences with our Services. We occasionally publish such content. When we publish this content, we may identify our users by their first and last name and may also indicate their home city. We obtain the user's consent prior to posting his or her name along with the testimonial. We may post user feedback on the Site from time to time. We will share your feedback with your first name and last initial only. If we choose to post your first and last name along with your feedback, we will obtain your consent prior to posting your name with your feedback. If you make any comments on a blog or forum associated with our Site, you should be aware that any Personal Data you submit there can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in these blogs and forums.

(c) Creation of Anonymous Data. We may create Anonymous Data records from Personal Data by excluding information (such as your name) that makes the data personally identifiable to you. We use this Anonymous Data to analyze request and usage patterns so that we may enhance the content of our Services and improve Site navigation. We reserve the right to use Anonymous Data for any purpose and disclose Anonymous Data to third parties in our sole discretion.

6. Disclosure of Your Personal Data. We disclose your Personal Data as described below and as described elsewhere in this Privacy Policy.

(a) Third Parties Designated by You. When you use the Services, the Personal Data you provide will be shared with the third parties that you designate to receive such information, including other websites, your friends, relatives and business associates. Depending on the type of access you grant to such third parties, they may also be permitted to edit the information you have provided to us and to designate others to access and edit such information. You may change your settings at any time as to who has access to your information by going to your account settings and changing your publishing options.

(b) Third Party Service Providers. We may share your Personal Data with third party service providers to: provide you with the Services that we offer you through our Site; to conduct quality assurance testing; to facilitate creation of accounts; to provide technical support; and/or to provide other services to the Company. These third party service providers are required not to use your Personal Data other than to provide the services requested by Company.

(c) Affiliates. We may share some or all of your Personal Data with our parent company, subsidiaries, joint ventures, or other companies under a common control (“Affiliates”), in which case we will require our Affiliates to honor this Privacy Policy.

(d) Corporate Restructuring. We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

(e) Information Shared with Third Party Services. By linking with a Standards Organization, you are allowing the Services to access your information and perform certain operations through the Standards Organization on your behalf, and you are agreeing to the Standards Organization’s terms of use in your use of the Services. By submitting a Report to a Standards Organization via the Services, you authorize Measurabl to submit the Report to the Standards Organization on your behalf. The privacy policies of these Standards Organizations may apply to the use and disclosure of your Personal Data that we collect and disclose to such Standards Organizations. Because we do not control the privacy practices of the Standards Organizations, you should read and understand their privacy policies.

AS A RESULT, WE MAY PROVIDE YOUR PERSONAL DATA TO A THIRD PARTY COMPANY. BECAUSE WE DO NOT CONTROL THE PRIVACY PRACTICES OF THESE THIRD PARTY COMPANIES, YOU SHOULD READ AND UNDERSTAND THEIR PRIVACY POLICIES.

NOTICE TO CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

(AS PROVIDED BY CALIFORNIA CIVIL CODE SECTION 1798.83)

A CALIFORNIA RESIDENT WHO HAS PROVIDED PERSONAL DATA TO A BUSINESS WITH WHOM HE/SHE HAS ESTABLISHED A BUSINESS RELATIONSHIP FOR PERSONAL, FAMILY, OR HOUSEHOLD PURPOSES (A “CALIFORNIA CUSTOMER”) MAY REQUEST INFORMATION ABOUT WHETHER THE BUSINESS HAS DISCLOSED PERSONAL INFORMATION TO ANY THIRD PARTIES FOR THE THIRD PARTIES’ DIRECT MARKETING PURPOSES. IN GENERAL, IF THE

BUSINESS HAS MADE SUCH A DISCLOSURE OF PERSONAL DATA, UPON RECEIPT OF A REQUEST BY A CALIFORNIA CUSTOMER, THE BUSINESS IS REQUIRED TO PROVIDE A LIST OF ALL THIRD PARTIES TO WHOM PERSONAL DATA WAS DISCLOSED IN THE PRECEDING CALENDAR YEAR, AS WELL AS A LIST OF THE CATEGORIES OF PERSONAL DATA THAT WERE DISCLOSED. CALIFORNIA CUSTOMERS MAY REQUEST FURTHER INFORMATION ABOUT OUR COMPLIANCE WITH THIS LAW BY E-MAILING INFO@MEASURABL.COM. PLEASE NOTE THAT WE ARE REQUIRED TO RESPOND TO ONE REQUEST PER CALIFORNIA CUSTOMER EACH YEAR AND WE ARE NOT REQUIRED TO RESPOND TO REQUESTS MADE BY MEANS OTHER THAN THROUGH THIS E-MAIL ADDRESS.

(f) Public Profile. Certain portions of the information you provide to us may also be displayed in your Profile. As an essential element of the Services, most of the Personal Data you explicitly provide to us when you register or update your Profile is displayed on your Profile. In order for your Profile to be made public, you must go to your profile settings and then to profile visibility. By default, your Profile is not for public viewing. Your photos, posts, friends, and other content you post to the Site are also meant for public consumption. We may display this content on the Site, and further distribute it to a wider audience through third party sites and services. Once displayed on publicly viewable web pages, that information can be collected and used by others. We cannot control who reads your posting or what other users may do with the information that you voluntarily post, so it is very important that you do not put Personal Data in your posts. Once you have posted information publicly, while you will still be able to edit and delete it on the Site, you will not be able to edit or delete such information cached, collected, and stored elsewhere by others (e.g., search engines).

(g) Other Disclosures. Regardless of any choices you make regarding your Personal Data (as described below), Company may disclose Personal Data if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on Company; (c) to protect or defend the rights or property of Company or users of the Site or Services; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

7. Third Party Websites. Our Site may contain links to third party websites. When you click on a link to any other website or location, you will leave our Site and go to another site and another entity may collect Personal Data or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your Personal Data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content or websites.

8. Your Choices Regarding Your Information. You have several choices regarding use of information on our Services:

(a) Email Communications. We will periodically send you free newsletters and e-mails that directly promote the use of our Site or Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information above). Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Policy.

(b) Cookies. If you decide at any time that you no longer wish to accept cookies from our Service for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Consult your browser’s technical information. If you do not accept cookies, however, you may not be able to use all portions of the Service or all functionality of the Service. If you have any questions about how to disable or modify cookies, please let us know at the contact information provided above.

(c) Changing or Deleting Your Personal Data. All Users may review, update, correct or delete the Personal Information in their User account (including any imported contacts) by contacting us or by editing their profile via the Service. If you completely delete all of your Personal Information, then your User account may become deactivated. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes. (For more information on how to control your User Content on the Service, including information regarding the use and storage of your User Content, please see the “Sharing Your Content” section in our Terms of Service.)

9. Security of Your Personal Data. Company is committed to protecting the security of your Personal Data. We use a variety of industry-standard security technologies and procedures to help protect your Personal Data from unauthorized access, use, or disclosure. We also require you to enter a password to access your Account information. Please do not disclose your Account password to unauthorized people. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while Company uses reasonable efforts to protect your Personal Data, Company cannot guarantee its absolute security.

10. Changes to This Privacy Policy. This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy here [<https://www.measurabl.com/wp-content/uploads/measurabl-privacy-policy.pdf>] and we will



change the “Last Updated” date. You should consult this Privacy Policy regularly for any changes.

11. A Note About Children. We do not intentionally gather Personal Data from visitors who are under the age of 13. If a child under 13 submits Personal Data to Company and we learn that the Personal Data is the information of a child under 13, we will attempt to delete the information as soon as possible. If you believe that we might have any Personal Data from a child under 13, please contact us at support@measurabl.com.