

## Privacy Policy

Effective as of February 21, 2020

This “Privacy Policy” describes the privacy practices of System Inc. and our subsidiaries and affiliates (collectively, “System”, “we”, “us”, or “our”) in connection with the [www.system.com](http://www.system.com) website and any other website that we own or control and which posts or links to this Privacy Policy (collectively, the “Service”), and the rights and choices available to individuals with respect to their information. System may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information. These supplemental privacy policies will govern how we may process the information in the context of the specific product or service.

We provide important information for individuals located in the European Union, [European Economic Area](#), and United Kingdom (collectively, “Europe” or “European”) [below](#).

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### Personal Information We Collect

**Information you provide to us.** Personal information you provide to us through the Service or otherwise includes:

- **Business and personal contact information**, such as your first and last name, email and mailing addresses, phone number, professional title and company name.
- **Content you choose to add or upload to the Service**, such as text, images, audio, and video, along with the metadata associated with the files you upload.

- **Profile information**, such as your username and password that you may set to establish an online account with us, your photograph, interests, and preferences.
- **Registration information**, such as information that may be related to a service, an account or an event you register for.
- **Feedback or correspondence**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us online.
- **Demographic Information**, such as your city, state, country of residence, and postal code.
- **Usage information**, such as information about how you use the Service and interact with us, including information associated with any content you upload to the websites or otherwise submit to us, and information you provide when you use any interactive features of the Service.
- **Marketing information**, such as your preferences for receiving communications about our activities, events, and publications, and details about how you engage with our communications
- **Other information** that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

**Information provided by other users on the platform.** Other users might add metadata and information identifiable to you or one of your published works via a third-party managed digital object identifier (DOI), and in so doing make your name, work or educational affiliation, open researcher and contributor ID (ORCID) available on the platform in the context of your work.

**Information we obtain from social media platforms.** We may maintain pages for System on social media platforms, such as LinkedIn, Google, Instagram, and other third party platforms. When you visit or interact with our pages on those platforms, the platform provider’s privacy policy will apply to your interactions and their collection, use and processing of your personal information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.

If you choose to login to the Service via a third-party platform or social media network, or otherwise connect your account on the third-party platform or network to your account through the Service, we may collect information from that platform or network. For example, this information may include your Google username, user ID, and profile picture. You may also have the opportunity to provide us with additional information via the third-party platform or network, such as a list of your connections and your email address. You can read more about your privacy choices in the “Third party platforms or social media networks” portion of the “Your Choices” section.

**Information we obtain from other third parties.** We may receive personal information about you from third-party sources. For example, a business partner may share your contact information with us if you have expressed interest in learning specifically about our products or services, or the types of products or services we offer. We may obtain your personal information from other third parties, such as marketing partners, publicly-available sources and data providers.

## **Cookies and Other Information Collected by Automated Means**

We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity occurring on or through the Service. The information that may be collected automatically includes your computer or mobile device operating system type and version number, manufacturer and model, device identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, the website you visited before browsing to our website, general location information such as city, state or geographic area; and information about your use of and actions on the Service, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. Our service providers and business partners may collect this type of information over time and across third-party websites and mobile applications.

On our webpages, this information is collected using cookies, browser web storage (also known as locally stored objects, or "LSOs"), web beacons, and similar technologies, and our emails may also contain web beacons.

See our [Cookie Policy](#) for more information.

## **Referrals**

Users of the Service may have the opportunity to refer colleagues or other contacts to us. If you are an existing user, you may only submit a referral if you have permission to provide the referral's contact information to us so that we may contact them.

## **How We Use Your Personal Information**

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

**To operate the Service.** We use your personal information to:

- provide, operate and improve the Service
- provide information about our products and services
- establish and maintain your user profile on the Service
- facilitate you to login to the Service via third-party identity and access management providers, such as Google
- enable security features of the Service, such as by sending you security codes via email or SMS, and remembering devices from which you have previously logged in
- communicate with you about the Service, including by sending you announcements, updates, security alerts, and support and administrative messages
- communicate with you about events or contests in which you participate
- understand your needs and interests, and personalize your experience with the Service and our communications
- provide support and maintenance for the Service
- respond to your requests, questions and feedback

**For research and development.** We analyze use of the Service to improve the Service and to develop new products and services, including by studying user demographics and use of the Service.

**To send you marketing and promotional communications.** We may send you System-related marketing communications as permitted by law. You will have the ability to opt-out of our marketing and promotional communications as described in the [Opt out of marketing](#) section below.

**To comply with law.** We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

**For compliance, fraud prevention, and safety.** We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Service; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

**With your consent.** In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

**To create anonymous, aggregated or de-identified data.** We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data personally identifiable to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

### **How We Share your Personal Information**

We do not share your personal information with third parties without your consent, except in the following circumstances or as described in this Privacy Policy:

**Affiliates.** We may share your personal information within our corporate family for purposes consistent with this Privacy Policy.

**Service providers.** We may share your personal information with third party companies and individuals that provide services on our behalf or help us operate the Service (such as customer support, hosting, analytics, email delivery, marketing, and database management services). These third parties may use your personal information only as directed or authorized by us and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

**Third-party platforms and social media networks.** If you have enabled features or functionality that connect the Service to a third-party platform or social media network (such as by logging in to the Service using your account with the third-party, providing your API key or similar access token for the Service to a third-party, or otherwise linking your account with the Service to a third-party's services), we may disclose the personal information that you authorized us to share. We do not control the third party's use of your personal information.

**Other Users of the Service and the Public.** We may provide functionality that enables you to disclose personal information to other users of the Service or the public. For instance, you may be able to maintain a user profile with information about yourself that you can make available to other users or the public. You may also be able to submit content to the Service (such as comments, reviews, surveys, blogs, photos, and videos), and we will display your name, username, and a link to your user profile along with the content you submit. We may make available settings through My System that enables you to exercise choice regarding certain information that is displayed publicly or to other users. We do not control how other users or third parties use any personal information that you make available to other users or the public.

**Professional advisors.** We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

**For compliance, fraud prevention and safety.** We may share your personal information for the compliance, fraud prevention and safety 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.

## **Your Choices**

In this section, we describe the rights and choices available to all users. Users who are located within the European Union can find additional information about their rights [below](#).

**Access or Update Your Information.** If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account.

**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, or by contacting us at [beta@system.com](mailto:beta@system.com). You may continue to receive service-related and other non-marketing emails. If you receive marketing text messages from us, you may opt out of receiving further marketing text messages from us by replying STOP to our marketing message.

**Cookies & Browser Web Storage.** We may allow service providers and other third parties to use cookies and similar technologies to track your browsing activity over time and across the Service and third party websites. For more details, see our [Cookie Policy](#).

**Privacy settings.** We make available certain privacy settings on the Service through My System, including options to control certain information that is displayed publicly or to other users.

**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>.

**Choosing not to share your personal information.** Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Service to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our services. We will tell you what information you

must provide to receive the Service by designating it as required at the time of collection or through other appropriate means.

**Third-party platforms or social media networks.** If you choose to connect to the Service via a third-party platform or social media network, you may have the ability to limit the information that we may obtain from the third-party at the time you login to the Service using the third-party's authentication service or otherwise connect your account. Subsequently, you may be able to control your settings through the third-party's platform or service. If you withdraw our ability to access certain information from a third-party platform or social media network, that choice will not apply to information that we have already received from that third-party.

### **Other sites, mobile applications and services**

The Service 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 sharing of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

### **Security practices**

The security of your personal information is important to us. We employ a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

### **International data transfers**

We are headquartered in the United States and have service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, or country where privacy laws may not be as protective as those in your state, province, or country.

European Union users should read the important information provided [below](#) about transfer of personal information outside of the European Union.

### **Children**

As a general rule, children are not allowed to use the Service, and we do not collect personal information from them. We define "children" as follows:

- Residents outside of Europe: anyone under 13 years old; and
- Residents of Europe: anyone under 16 years old, or the age needed to consent to the processing of personal information in your country of residence.

If we learn that we have collected personal information of a child without the consent of the child's parent or guardian, we will delete it. We encourage parents with concerns to [contact us](#).

### **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 Service. We may, and if required by law will, also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Service.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

**How to Contact Us**

Please direct any questions or comments about this Policy or privacy practices to beta@system.com. You may also write to us via postal mail at:

System Inc.  
 Attn: Legal – Privacy  
 57 Great Jones Street, 2nd Floor, New York, NY 10012

**Notice to European Users**

The information provided in this “Notice to European Users” section applies only to individuals in Europe.

**Personal information.** References to “personal information” in this Privacy Policy are equivalent to “personal information” governed by European data protection legislation.

**Controller and EU Data Representative.** System Inc. is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation.

**Legal bases for processing.** We use your personal information only as permitted by law. Our legal bases for processing the personal information described in this Privacy Policy are described in the table below.

<p><b>Processing purpose</b> (click link for details)</p> <p><i>Details regarding each processing purpose listed below are provided in the section above titled “How we use your personal information”.</i></p>	<p><b>Legal basis</b></p>
<p><b>To operate the Service</b></p>	<p>Processing is necessary to perform the contract governing our provision of the Service or to take steps that you request prior to signing up for the Service. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the Service you access and request.</p>
<ul style="list-style-type: none"> <li>● <b>To administer events and contests</b></li> <li>● <b>For research and development</b></li> <li>● <b>To send you marketing and promotional communications</b></li> </ul>	<p>These activities constitute our legitimate interests. We do not use your personal information for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).</p>

<ul style="list-style-type: none"> <li>• For compliance, fraud prevention and safety</li> <li>• To create anonymous data</li> </ul>	
<b>To comply with law</b>	Processing is necessary to comply with our legal obligations.
<b>With your consent</b>	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or in the Service.

**Use for new purposes.** We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

**Sensitive personal information.** We ask that you not provide us with any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Service, or otherwise to us.

If you provide us with any sensitive personal information to us when you use the Service, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Service.

### **Retention**

We retain personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

### **Your rights**

European data protection laws give you certain rights regarding your personal information. If you are located within the European Union, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to [privacy@system.com](mailto:privacy@system.com) or our postal address provided [above](#). We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may [contact us](#) or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

### **Cross-Border Data Transfer**

If we transfer your personal information out of Europe to a country not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be performed:

- Pursuant to the recipient's compliance with standard contractual clauses, EU-US Privacy Shield (or Swiss-US Privacy Shield, as applicable), or Binding Corporate Rules
- Pursuant to the consent of the individual to whom the personal information pertains
- As otherwise permitted by applicable European requirements.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.

## Cookie Policy

This Cookie Policy explains how System Inc. (“**System**”, “**we**”, “**us**” or “**our**”) uses cookies and similar technologies in connection with the [www.system.com](http://www.system.com) website and any other website that we own or control and which posts or links to this Cookie Policy (collectively, the “**Sites**”).

### What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies serve different purposes, like helping us understand how a site is being used, letting you navigate between pages efficiently, remembering your preferences and generally improving your browsing experience.

Our Sites may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them).

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Sites; and (2) third party cookies, which are served by service providers or business partners on our Sites, and can be used by these parties to recognize your computer or mobile device when it visits other websites. Third party cookies can be used for a variety of purposes, including site analytics, advertising and social media features.

### What types of cookies and similar tracking technologies does System use on the Sites?

On the Sites, we use cookies and other tracking technologies in the following categories described in the table below.

<b>Type</b>	<b>Description</b>	<b>Who serves the cookies</b> (link to privacy policy/site)	<b>How to control them</b>
<i>Analytics</i>	These cookies help us understand how our Service is performing and being used. These cookies may work with web beacons included in emails we send to track which emails are opened and which links are clicked by recipients.	<a href="#">Google Analytics</a>	See ‘your choices’ below.  Google Analytics uses its own cookies. You can find out more information about Google Analytics cookies <a href="#">here</a> and about how Google protects your data <a href="#">here</a> . You can prevent the use of Google Analytics relating to your use of our Sites by downloading and installing a browser plugin available <a href="#">here</a> .
<i>Essential</i>	These cookies are necessary to allow the technical operation of our Service (e.g., they enable you to move	<a href="#">Google Tag Manager</a>	See ‘your choices’ below.

	around on a website and to use its features).		
<i>Functionality/performance</i>	These cookies enhance the performance and functionality of our Service.	<a href="#">Intercom</a>	See 'your choices' below.

### **Other technologies**

In addition to cookies, our Sites may use other technologies, such as pixel tags, to collect information automatically.

#### *Browser Web Storage*

We may use browser web storage (including via HTML5), also known as locally stored objects (“LSOs”), for similar purposes as cookies. Browser web storage enables the storage of a larger amount of data than cookies. Your web browser may provide functionality to clear your browser web storage.

#### *Web Beacons*

We may also use web beacons (which are also known as pixel tags and clear GIFs) on our Sites and in our HTML formatted emails to track the actions of users on our Sites and interactions with our emails. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages or within HTML formatted emails. Pixel tags are used to demonstrate that a webpage was accessed or that certain content was viewed, typically to measure the success of our marketing campaigns or engagement with our emails and to compile statistics about usage of the Sites, so that we can manage our content more effectively.

### **Your choices**

Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Sites may not work properly.

For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). If you do not accept our cookies, you may experience some inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

Users may opt out of receiving targeted advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). European users may opt out of receiving targeted advertising on websites through members of the European Interactive Digital Advertising Alliance by clicking [here](#), selecting the user’s

country, and then clicking “Choices” (or similarly-titled link). Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above.

If you choose to opt-out of targeted advertisements, you will still see advertisements online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.

For more information about how we collect, use and share your information, see our [Privacy Policy](#).

### **Changes**

Information about the cookies we use may be updated from time to time, so please check back on a regular basis for any changes.

### **Questions**

If you have any questions about this Cookie Policy, please contact us by email at [privacy@system.com](mailto:privacy@system.com).

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