

# Privacy Statement

Effective Date: May 25, 2018

At Quadratic Labs Inc. (“Quadratic Labs”), your privacy is important to us. The purpose of this privacy statement is to let you know how we collect, use and disclose Personal Information within our product Attractor, and to inform you of your rights with respect to such Personal Information. It is effective as of the Effective Date.

## About Quadratic Labs

Attractor by Quadratic Labs is an online analytics service that enables its Customers to analyze data from multiple product analytics sources by application of statistical and machine learning algorithms and produce actionable insights for product improvement (the “Service”). The Service integrates with product analytics data sources - mParticle and Mixpanel. Over the course of time list of inbound product analytics sources will be constantly updated.

## Applicability Of Privacy Statement

This Privacy Statement relates to “Personal Information”, meaning information about an identifiable individual, whether, for example, that individual is our Customer, or our Customer’s provisioned user or an individual whose information is part of Processed Data, as these terms are defined below. Whether a person is “identifiable” means that they can be identified by the information itself or by that information combined with other information reasonably available.

This Privacy Statement applies to Personal Information collected or managed by Quadratic Labs through the use of the Service and our website. This Privacy Statement is also intended to explain how we use information which is not identifiable (and thus not Personal Information) that is collected via our website and the Service.

“Customer” refers to the customers of Quadratic Labs and their provisioned users.

“Customer Information” refers to information about our Customers and their provisioned users.

“Processed Data” refers to information that is processed by Quadratic Labs on behalf of our Customers through their use of the Service.

Quadratic Labs does not have a direct relationship with many of the individuals whose Personal Information is included in Processed Data, but this privacy statement is intended to provide information about how all Personal Information is collected, used, disclosed, processed and protected by Quadratic Labs.

## **Classification Of Information**

When the Service is used by our Customers, we classify the Personal Information we collect, use and disclose into two main categories: The first is Personal Information included in Customer Information, and the second is Personal Information that is included in Processed Data. It is important to note that not all Customer Information or Processed Data is Personal Information, either because it relates to a company or a business, or it is not identifiable.

## **Processed Data**

Quadratic Labs does not control what information a Customer chooses to include in Processed Data. Because we are unable to determine whether it is Personal Information or other information, we treat it as though it may be Personal Information but our Customers are entirely responsible for any Personal Information they choose to include in Processed Data. All Customers and their provisioned users should understand that data in Quadratic Labs can be exported, shared or displayed by a Customer or provisioned user. Customers and provisioned users are solely responsible for the use of such exported, shared or displayed data and for protecting it appropriately.

# What Information We Collect

From our Customers, we only collect Customer Information that is necessary to establish and maintain the provision of the Service to them, as well as to understand and improve the usage and performance of the Service. When our Customers are corporations, as opposed to individuals, this information is not “Personal Information”. This Customer Information includes:

- Customer name
- Contact information, including postal and email addresses
- Billing address
- Billing details (as necessary for our internal accounting purposes and for processing payments through our contracted processing service)
- Login information for authorized users, such as usernames and encrypted passwords
- Information about how the Customer and its authorized users use the Service, including information about the Customer, location information, usage patterns and intended use of the Service.
- Information provided by the Customer and its authorized users in connection with any support given by the Quadratic Labs team related to the Service.
- Login information for third party integrations to Quadratic Labs, such as usernames, encrypted passwords

In connection with our marketing, sales and Customer support functions, we may collect publicly-available information about our Customers and provisioned users, which is used for the purposes set out in this Privacy Statement.

## Purposes For Collection

As stated in more detail in our [Terms of Service](#), Quadratic Labs does not use any identifiable Processed Data for its own purposes. Processed Data is only processed by Quadratic Labs on behalf of our Customers to provide them with the Service. Individual provisioned users whose Personal Information is contained in Processed Data should refer to the Customer’s privacy policy for an understanding of how Personal Information is collected, used, disclosed and otherwise processed by the Customer by use of the Service.

# Disclosure Of Personal Information

Quadratic Labs may share Personal Information with people within the company who have a “need to know” the information for business or legal reasons, for example, in order to carry out an administrative function, such as processing an invoice or supporting questions that you have submitted to Quadratic Labs. We may share Personal Information with third parties, including:

- government and regulatory authorities, for example to respond to a legal request or comply with a legal obligation, in which case we will make reasonable efforts to give the relevant individual notice of the disclosure, provided we are able to identify the individual and are lawfully able to do so;
- for the purposes of seeking legal or other professional advice;
- suppliers of IT services and third service providers engaged by Quadratic Labs as further detailed in this Privacy Statement and our [Terms of Service](#) and
- in the event that we sell, buy or merge any business or assets, including to the prospective seller or buyer of such business or assets and their respective professional advisers.

We may also share anonymous or de-identified information with other third parties in connection with the purposes outlined in this Privacy Statement.

## Right Of Access

Pursuant to applicable law, you may have certain rights in relation to your Personal Information, including a right of access. If your Personal Information is a part of our Customer’s Processed Data, you should seek this access from the relevant Customer. If we control the Personal Information, we may require additional information to confirm your identity, which will only be used for that purpose.

## Data Location

Unless a Customer is using a Custom Data Store and therefore storing their Processed Data on their site, Quadratic Labs uses Amazon Web Services to store and manage Customer Information and Processed Data in and from United States and to back up Customer Information and Processed Data in Ireland. As indicated in the following section, Quadratic Labs uses service providers outside of United States to store and manage the certain data and analytics associated with use of the Service.

# Information Collected Via Our Website

When you visit our websites, [quadraticlabs.com](http://quadraticlabs.com) and [attractor.ai](http://attractor.ai), we may use cookies, pixel tags, analytics tools, and other similar technologies to help provide and improve our services to you, and as detailed below:

**Cookies:** Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the website, pages visited, language preferences, and other web traffic data. We use the information for security purposes, to facilitate online navigation, to display information more effectively, to personalize your experience while using the website, and to otherwise analyze user activity. We can recognize your computer to assist your use of the website.

We also gather statistical information about the usage of the website and application in order to continually improve their design and functionality, understand how they are used, and assist us with resolving questions regarding the website and application. Cookies may further allow us to select which of our advertisements, features or offers are most likely to appeal to you and to display them to you. We may also use cookies in online advertising, features or offers to see how you interact with such advertisements, features or offers and we may use cookies or other files to understand your use of other websites.

If you do not want information to be collected through the use of cookies when using our website or application, there is a simple procedure in most browsers that allows you to automatically decline cookies or gives you the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. However, if you do not accept these cookies, you may experience some inconvenience in your use of the website or application. For example, we may not be able to recognize your computer, and you may need to log in every time you visit the website or application.

**Pixel tags and other similar technologies:** Pixel tags (also known as web beacons and clear GIFs) may be used in connection with our website to, among other things, track the actions of users of the website and other means of communication with you (including e-mail recipients), measure the success of our marketing campaigns, and compile statistics about usage of the website and response rates.

Analytics tools: We use website and application analytics services provided by third parties that use cookies, JavaScript and other similar technologies to collect information about website or application use, perform data enrichment and to report patterns or trends. The third parties that provide us with these services may also collect information about your use of third-party websites. These analytics providers may store this analytics data in the United States and other locations. [Here](#) is the list of analytics tools we use so that you may review their terms of service, some of which include instructions on how you may opt out of certain third party information collection practices. We will update this list as we change our analytics tools.

## Safeguarding Personal Information

We are required by law to safeguard the Personal Information in our custody or control. We use industry standard measures to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. We protect Personal Information regardless of the format in which it is held.

Our methods of protection include: (a) physical measures, such as restricted physical access to the systems delivering our Service; (b) organizational measures, including employee training and limiting access on a “need-to-know” basis; and, (c) technological measures, including the use of passwords and encryption. You can find out more about our security practices at <https://www.quadraticlabs.com/legal/security>.

We use service providers, including our data hosting provider, to facilitate providing the Service. We use contractual means to make sure that our service providers only deal with Personal Information on our behalf to provide the Service and not for any other purposes. We also undertake diligence to satisfy ourselves that our service providers will implement adequate safeguards to protect Personal Information.

If we have reason to believe that there has been a breach of security safeguards that has resulted in the inappropriate loss or disclosure of Personal Information, we will take reasonable measures to notify the affected Customers, as applicable, promptly and with sufficient detail to enable them to evaluate the breach and understand the likely consequences.

# Revisions To This Privacy Statement

Quadratic Labs may update this Privacy Statement from time to time. If it is updated, the effective date of the revision will be shown at the top of the Privacy Statement. In the event of a significant revision, Customers may receive notification by email or through the Service itself. All Personal Information collected after that revision date will be subject to the revised Privacy Statement.

## Anonymous Information

As stated in more detail in our [Terms of Service](#), Quadratic Labs may use de-identified and/or aggregate information derived from Personal Information, for any purposes, including:

- Analytics to understand how our Customers and, their authorized users make use of the Service and our website and to make targeted offerings of certain Services to our Customers and authorized users;
- Information used to determine how to make improvements to the Service and to develop new features, capabilities and ways of presenting data; and
- For commercial purposes, either for Quadratic Labs or for others.

We will take industry standard steps so that this de-identified and/or aggregate information cannot be connected to any particular individual.

## EU Personal Information

This section shall apply only in respect of Personal Information relating to individuals located in the EU (“EU Personal Information”).

For the purposes of applicable EU data protection and privacy laws, Quadratic Labs, with its registered offices at Vozdvyzhenkska 34A, Kyiv, Ukraine, 03039 is considered the Data Controller in respect of all EU Personal Information that it collects, uses and otherwise processes for its own purposes as set out in this Privacy Statement.

If you are a Customer, website user or other individual with whom we communicate and / or do business and you are located in the EU, you should read this Privacy Statement in full and particularly this section, before you provide us with any Personal Information or browse our website, and make sure that you are comfortable with our privacy practices.

Please note that for the purposes of EU data protection and privacy laws, personally identifiable information collected in a business context (for example an individual's business email address or job title) will be Personal Information. All provisions in this Privacy Statement relating to Personal Information will therefore apply to Customer Information, to the extent that this is considered to contain Personal Information under EU laws.

## **Purpose Of Processing**

The purposes for which we process EU Personal Information are as set out in this Privacy Statement. In most cases, we will be processing EU Personal Information on behalf of a Customer as a Data Processor, but in certain circumstances we will process EU Personal Information as a Data Controller, including for the purposes of communicating with you, administering your account and for carrying out data analytics and enrichment.

## **Legal Basis For Processing**

In accordance with the purposes for which we collect and use EU Personal Information, as set out above, the legal basis for Quadratic Labs processing EU Personal Information will typically be one of the following:

- your consent;
- the performance of a contract that we have in place with you or other individuals;
- Quadratic Labs or our third parties' legitimate business interests; or

- compliance with our legal obligations.

## Sharing Of EU Personal Information

Quadratic Labs may share EU Personal Information with people within the company who have a “need to know” the information for business or legal reasons, for example, in order to carry out an administrative function, such as processing an invoice or to direct a question that you have submitted to the relevant department at Quadratic Labs.

We may share EU Personal Information with third parties, including:

- government and regulatory authorities, for example to respond to a legal request or comply with a legal obligation, in which case we will make reasonable efforts to give the relevant individual notice of the disclosure, provided we are able to identify the individual and are lawfully able to do so;
- for the purposes of seeking legal or other professional advice;
- suppliers of IT services and third service providers engaged by Quadratic Labs as further detailed earlier in this Privacy Statement and our [Terms of Service](#);
- and
- in the event that we sell, buy or merge any business or assets, including to the prospective seller or buyer of such business or assets and their respective professional advisers.

We may also share anonymous or de-identified information with other third parties in connection with the purposes outlined in this Privacy Statement.

## Information Transfers

In order to provide the Service and our website and as further detailed in the ‘Data Location’ section above, any EU Personal Information that we obtain may be transferred to and stored in a country outside the EEA, including United States. This may include transferring EU Personal Information to countries where the law provides less protection for Personal Information. If we transfer EU Personal Information to a country outside of the EEA, we will, as required by applicable law, ensure that your privacy rights are protected by appropriate safeguards.

# Glossary

For the purposes of this section relating to EU Personal Information, the following terms will have the following meanings:

“Data Controller” an entity which determines the purposes and means of the processing of Personal Information.

“Data Processor” an entity which processes Personal Information on behalf of a Data Controller.

“EEA” European Economic Area.

“process” any operation that can be performed on Personal Information, including collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, and deleting it.

If you have any questions or concerns about our privacy practices, or if you wish to access your Personal Information, please contact our privacy officer at [legal@attractor.ai](mailto:legal@attractor.ai)