

TORSH Privacy Policy

Effective Date: April 8th, 2019

PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND OUR PRIVACY POLICIES AND PRACTICES. BY USING THIS SITE, YOU CONSENT TO THIS PRIVACY POLICY AND OUR COLLECTION AND SHARING OF YOUR PERSONALLY IDENTIFIABLE INFORMATION ACCORDING TO THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THIS POLICY, DO NOT ACCESS, VIEW, OR USE ANY PART OF THE SITE.

Introduction

Because we believe so strongly that the information you share with us is private and should remain so, we've decided to lay out exactly what you can expect from us when it comes to safeguarding the privacy of your information. This Privacy Policy (the "Policy") describes TORSH, Inc.'s ("TORSH", also referred to as "we", "us" and/or "our") use and sharing of (1) personally identifiable information ("PII") that you ("users" or "you") voluntarily provide to us when you use our website, <https://www.torsh.co> (the "Site"), and (2) certain information about you that is automatically collected when you access the Site.

This Policy does not apply to information collected by us offline or through any third party (including our affiliates and subsidiaries), including any third party application, website, or content (including advertising) that may link to or be accessible from this Site.

If you are looking to connect to our cloud-based video observation and feedback platform, TORSH Talent, please visit <https://torshtalent.com> and refer to the policies applicable to that website.

Changes to this Privacy Policy

We may change this privacy policy from time to time in our sole discretion without notice to you by updating this posting. You should periodically review this privacy policy carefully in order to inform you of the most current terms and conditions for the use of the Site. By continuing to use this Site, you agree to be bound by any such changes.

What Types of Information Do We Collect?

While using our Site, we may ask you to provide us with certain PII that can be used to contact or identify you, such as your full name, title, phone number, email address, telephone number, or mailing address. When purchasing our services, we may ask you to provide us with your financial account and routing information, debit or credit card number with expiration date, the last four digits of your social security number, or other PII relevant to processing your purchase. We will retain such PII only for as long as it is needed to fulfill the purpose for which it was collected or as required by the law.

Your PII also may be used for internal purposes, such as to provide you with other products and services you have requested. If you correspond with us by email, we may retain the content of

your email messages and your email address, and our responses in order to process your inquiries, respond to your requests, and improve our services. We may also collect PII from you when we enroll you in our email and/or hard copy marketing programs and will give you the option to “opt-out” of receiving such communications if you no longer wish to receive them.

If you choose to submit information, such as your resume / CV and cover letter, using the “Work at Torsh” section of our Site, we may ask you to submit for our consideration: your full name, address, email address, telephone number, or other contact information; information contained in your curriculum vitae, resume, or cover letter, such as previous work experience, education; type of employment sought, desired salary, willingness to relocate, or other job preferences, and full names and contact information for referrals. We will not seek any confidential or proprietary information you may have received from your previous employers. All such submissions are voluntary and revocable by you. If you choose not to provide all of the data that is requested for your application, our ability to consider you as a candidate may be limited.

Only employees, affiliates, and authorized third party service providers or vendors of Torsh who are bound to keep your PII confidential will process any PII submitted to us, for employment purposes or otherwise.

Aggregated Personal Information. TORSH conducts research on its customer demographics, interests and behavior based on the personal information and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and TORSH may share this aggregate data with its affiliates, agents, and business partners. This aggregate personal information does not identify you personally using any PII. TORSH may also disclose aggregated user statistics in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

What Types of Automated Information Collection is in Use?

Our Site uses Google Analytics and may use other similar technologies (the “Analytics Technologies”) to collect and process certain information about you and your use of the Site. Analytics Technologies collect statistical data that does not include PII, and we do not maintain it or associate it with any PII we collect in other ways or receive from third parties.

You may learn more about how Google uses the information it collects by visiting: [Google Privacy Policy - Partners](#). Google’s ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Privacy Policy located at [Google Privacy - Analytics](#).

Our web server and/or the Analytics Technologies may collect and store the following information about you when you visit our Site: the originating name of the domain from which you access the Internet; the date and time you access the Site; the pages of the Site you visit or the services you access on the Site; the Internet address of the website from which you linked directly to the Site; the type of device, device ID, operating system and web browser you use to

access the Site; the search engine and key words used that brought you to one of our sites; and the location of the device used to access the Site. This information is collected automatically. We use it to improve the Site by tracking the number of “hits” or visits to the Site, the most popular times of day and sections visited, and the range of devices and browsers most commonly used to view the Site. We do not sell any of this information to third parties.

What are cookies and how are they used?

We may use “cookies,” which are small files stored on your computer’s hard drive that are used to store and track personal information. Cookies are used to (a) remind us of who you are in order to deliver you better service; (b) estimate our audience size by determining repeat usage of the Site to help target advertisements based on user interests and behavior; and (c) measure certain traffic patterns to help us understand our users’ habits.

We may also collect log data, which may include information such as your computer's Internet Protocol ("IP") address (the Internet address of a computer), browser type, browser version, the pages of our site that you visit, the time and date of your visit, the time spent on those pages and other statistics. We analyze this log data for certain trends in usage statistics, such as which parts of our site users are visiting and how long they spend there during their session. In general, we do not link your IP addresses to anything personally identifiable to you.

How We Use Your Information

We may use the information that we collect about you or that you provide to us, including any PII:

- To present the Site and its contents to you;
- To provide you with information or services that you request from us;
- To fulfill any other purpose for which you provide it;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us;
- To notify you about changes to the Site or any services we offer or provide through it;
- In any other way we may describe when you provide the information; and/or
- For any other purpose with your consent.

By using the Site, you consent to the above uses of your information. You may revoke your consent at any time by contacting us with your request.

What Information Do We Share and With Whom?

We do not rent or sell any of your information to third party marketers. We will not send you any unsolicited third party newsletters, promotional mail, or email. As permitted by law, we may share your information with our affiliates, subsidiaries, or divisions and with their respective officers, directors, employees, accountants, attorneys, and agents, as necessary for us to continue to provide you with our products and services and defend our legal interests. In certain circumstances, we may also share your information with service providers or vendors that need access to your information to provide operational or other support services on our behalf.

To ensure the confidentiality and security of your information, service providers and vendors must agree to maintain the confidentiality of your information and are prohibited from using your PII except for the purposes for which we disclose it to them or as required by law. We also may provide information to regulatory authorities and law enforcement officials in accordance with applicable law or when we otherwise believe in good faith that the law, a court order, or legal process requires it or we may access or disclose your information in order to protect or defend our legal rights or property or that of our affiliated companies and our employees and agents, to protect the safety and security of end users, and to protect against fraud. We may also enforce our Terms of Use and or respond to claims that any posting or other content violates the rights of third parties. Finally, in the event that we sell, transfer or otherwise share some or all of our assets in connection with a merger, reorganization or sale of assets, or in the event of bankruptcy, your PII may be one of the assets transferred.

Third Parties With Whom We Share Information

In addition to Google Analytics, we may share your PII and non-PII with third parties who assist with delivery of our services and products. We use Zendesk in order to provide integrated personal support to you and address your concerns as soon as possible. Their privacy policy is available at: [ZenDesk Privacy Policy](#). This Site uses Facebook Domain Insights, which uses “cookies” in order to help the website to analyze overall traffic patterns through the website. By transmitting the information generated by the cookie about the use of the website to Facebook, setting ensures that IP address is anonymized before geo-localization and will be replaced by a generic IP address before storage. See [Facebook Data Policy](#) for more information. We also use a web performance and security service, CloudFlare, to ensure that the Services are secure and operate quickly. CloudFlare may collect non-personally identifiable information about you although we do not directly provide any information to them. Any such collection is governed by [CloudFlare’s Privacy Policy](#). We use the reCAPTCHA widget on this Site, which makes use of cookies to prevent spam requests from entering our public forms. Your use of reCAPTCHA is subject to the Google [Privacy Policy](#) and [Terms of Use](#).

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the PII you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Cookies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Site may then be inaccessible or not function properly,
- **Log files.** We track actions occurring on our Sites, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- **Web beacons, tags, and pixels.** We use these electronic files to record information about how you browse our Sites.

- **Google Analytics Opt-out Option.** Google uses data when you use our Service and how you may opt out: <https://www.google.com/policies/privacy/partners/>, <https://www.google.com/policies/technologies/partner-sites/>). If you do not want your information collected with Google Analytics, you also can install the Google Analytics opt-out browser add-on. To opt-out of Google Analytics, visit the Google Analytics opt-out page (located at <https://tools.google.com/dlpage/gaoptout>) and install the add-on for your browser.
- **Opt-out.** You may “opt-out” and unsubscribe from our communications by clicking on the “unsubscribe link” found at the bottom of any emails you may receive from us or third party affiliates or by contacting us directly.
- **Social Network and Platform Integration.** Our Site may be integrated with social media networks and other platforms (e.g., Facebook, Instagram) whereby information may be shared between us and those platforms. For instance, if you interact with our Service through a social media feature such as a plug-in, then you may be granting us on-going access to certain information from that social media account. If you do not want a social media platform to collect or share information about you, please review the privacy policy and privacy settings of the applicable social media property before using such features on our Site.

Security

We maintain reasonable and appropriate administrative, physical, electronic, and procedural safeguards to protect your information. When you enter PII, we encrypt that information using secure socket layer technology (“SSL”). Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. We cannot guarantee or warrant the security of any information you transmit to or from our Site, and you do so at your own risk. We are not responsible for any circumvention of any privacy settings or security measures we provide. We make no warranties, express, implied or otherwise as to the ultimate effectiveness of these reasonable and appropriate safeguards.

The safety and security of your information also depends on you. Where we have given you (or you have chosen) a password for access to certain parts of the Site, you are responsible for keeping this password confidential. Do not to share your password with anyone else. In particular, email sent to or from the Site may not be secure. Therefore, you should take special care in deciding what information you send to us via email or through any web chat function made available to you, such as ZenDesk. Please keep this in mind when disclosing any PII via the Internet on our Site or others.

How Can I Access My Information?

If you have any questions about PII that may be retained by us, you may contact us using the contact information provided below. Upon your reasonable request, we will allow you to review PII under our control, if any, as well as information about the ways in which that information is being used and disclosed. We will use commercially reasonable efforts to ensure that PII we

may be using or disclosing is accurate and complete. If you are able to verify that your information is inaccurate or incomplete, the information will be amended as appropriate. We will use commercially reasonable efforts to respond to any request to review and update your PII.

Your California Privacy Rights

A business subject to California Civil Code section 1798.83 is required to disclose to its California customers, upon request, once per calendar year, the identity of any third parties to whom the business has disclosed personal information within the previous calendar year, along with the type of personal information disclosed, for the third parties' direct marketing purposes.

If you are a California resident and would like to make such a request, please contact us at contact@torsh.co.

Retention and Removal of Information

We will retain your personal information as needed to fulfill the purposes for which it was collected, comply with our legal obligations, resolve disputes, and enforce our agreements. Upon your request, we will make commercially reasonable efforts to remove all your PII from our records. If you would like to request that we remove your PII from our records, please contact us using the contact information provided below.

Location and Storage of Information

Torsh controls and operates the Site from locations in the United States. If you are located outside the United States and you choose to provide information to us, then by using the Site and any services contained therein, and by consenting to the terms of this Policy and submitting your personal information to us, you consent to the transfer of your personal information to the United States.

Protecting Children

We are committed to protecting the privacy of children. This Site is not intended for use by children under the age of 16. We do not knowingly solicit or collect PII from any child under the age of 16. If you are under the age of 16, do not use or provide any information on the Site or provide us with any information about yourself, such as your name, telephone number, email address or any screen name or user name you may use. If we learn we have collected or received PII from a child under the age of 16 without verification of parental consent, we will delete that information. For additional information on Children's Online Privacy Protection Act of 1998 (COPPA) protections, visit: <https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions>.

Links to Other Sites

We may post links to or content from third party websites. In addition, such third party media and content may also contain external links. This Policy is applicable only to the Site and does not apply to any third party websites. We do not endorse or review third party websites linked to or from this Site. Because of the dynamic media capabilities of the Site, it may not be clear to you which links are embedded in the Site and which are embedded in third-party media and/or content. We cannot and do not guarantee the privacy policies and practices of any third party. We do not control, operate, or endorse any information, products, or services of any third party websites that may be reached through links from the Site. The use of any personal information provided by you to such third party will be governed by that party's privacy policy. If you are unsure whether a website is controlled, affiliated, or managed by us, you should review the privacy policy at each linked website to determine how that site treats your personal information.

Legal Disputes

The laws of the State of Louisiana will govern this Agreement, as well as any claim that we may have against each other. If we end up in court, you agree to submit to the personal jurisdiction, and that venue is proper in any court located in New Orleans, LA.

Contacting TORSH

Got questions, feedback, comments about the Site or our privacy practices? We want to hear from you! Contact us at contact@torsh.co.