**PEREGRINE**

**PRIVACY POLICY**

Last Modified: September 30, 2022

At Peregrine, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Website in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

Remember that your use of Peregrine's Website is at all times subject to our Terms of Use< https://peregrine.io/terms-of-use/>, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

You may print a copy of this Privacy Policy by clicking here<INSERT LINK THAT LAUNCHES PRINTABLE VERSION>.

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What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Website. “**Personal Data**” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

Personal Data

*Categories of Personal Data We Collect*

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

|  |  |  |
| --- | --- | --- |
| **Category of Personal Data**  | **Examples of Personal Data We Collect** | **Categories of Third Parties With Whom We Share this Personal Data:** |
| **Profile or Contact Data** | * First and last name
* Email
* Phone number
 | * N/A
 |
| **Web Analytics** | * Web page interactions
* Referring webpage/source through which you accessed the Website
* Statistics associated with the interaction between device or browser and the Website
 | * Analytics Partners that we collect this data from, as per their terms (see Cookies section)
 |
| **Geolocation Data** | * IP address-based location information
 | * N/A
 |
| **Professional or Employment-Related Data** | * Resume
* Job title
* Job history
* LinkedIn profile
 | * N/A
 |

*Categories of Sources of Personal Data*

We collect Personal Data about you from the following categories of sources:

* **You**
	+ When you provide such information directly to us.
		- When you use our interactive tools and Website.
		- When you send us an email or otherwise contact us.
	+ When you use the Website and such information is collected automatically.
		- Through Cookies (defined in the “Tracking Tools and Opt-Out” section below).

*Our Commercial or Business Purposes for Collecting Personal Data*

* **Providing, Customizing and Improving the Website**
	+ Providing you with the products, Website or information you request.
	+ Meeting or fulfilling the reason you provided the information to us.
	+ Providing support and assistance for the Website.
	+ Improving the Website, including testing, research, internal analytics and product development.
	+ Personalizing the Website, website content and communications based on your preferences.
	+ Doing fraud protection, security and debugging.
	+ Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “**CCPA**”).
* **Marketing the Website**
	+ Marketing and selling the Website.
* **Corresponding with You**
	+ Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Peregrine or the Website.
	+ Sending emails and other communications according to your preferences or that display content that we think will interest you.
* **Meeting Legal Requirements and Enforcing Legal Terms**
	+ Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
	+ Protecting the rights, property or safety of you, Peregrine or another party.
	+ Enforcing any agreements with you.
	+ Responding to claims that any posting or other content violates third-party rights.
	+ Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

How We Share Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

* **Service Providers.** These parties help us host the Website or perform business functions on our behalf. They include:
	+ Hosting, technology and communication providers.
* **Analytics Partners**. These parties provide us with analytics services to analyze your usage of the Website. They include:
	+ Google Analytics

*Legal Obligations*

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

*Business Transfers*

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

*Data that is Not Personal Data*

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Website and promote our business, provided that we will not share such data in a manner that could identify you.

Tracking Tools and Opt-Out

The Website use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “**Cookies**”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Website, analyze trends, learn about our user base and operate and improve our Website. Cookies are small pieces of data– usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Website. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Website does not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

* Essential Cookies. Essential Cookies are required for providing you with features or Website that you have requested. For example, certain Cookies enable you to log into secure areas of our Website. Disabling these Cookies may make certain features and Website unavailable.
* Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Website. They do this by collecting information about the number of visitors to the Website, what pages visitors view on our Website and how long visitors are viewing pages on the Website. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Website’ content for those who engage with our advertising. For example, Google LLC (“**Google”)** uses cookies in connection with its Google Analytics Website. Google’s ability to use and share information collected by Google Analytics about your visits to the Website is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy\_ads.html or the Google Analytics Opt-out Browser Add-on at https://tools.google.com/dlpage/gaoptout/.

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Website and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. Although we work to protect the security of your data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as necessary to provide you with our Website. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Personal Data of Children

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Website or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at privacy@peregrine.io

California Resident Rights

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain Website to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@peregrine.io

*Access*

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

* The categories of Personal Data that we have collected about you.
* The categories of sources from which that Personal Data was collected.
* The business or commercial purpose for collecting or selling your Personal Data.
* The categories of third parties with whom we have shared your Personal Data.
* The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third-party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third-party recipient.

*Deletion*

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Website or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

*Exercising Your Rights*

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “**Valid Request**.” We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

* Email us at: privacy@peregrine.io

You may also authorize an agent (an “**Authorized Agent**”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

*Personal Data Sales Opt-Out and Opt-In*

We will not sell your Personal Data, and have not done so over the last 12 months. To our knowledge, we do not sell the Personal Data of minors under 18 years of age.

*We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA*

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or Website access, charge you different prices or rates, or provide you a lower quality of goods and Website if you exercise your rights under the CCPA. However, we may offer different tiers of our Website as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or Website you receive related to the value of Personal Data that we receive from you.

Other State Law Privacy Rights

*California Resident Rights*

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at privacy@peregrine.io. However, we do not currently provide your Personal Data to any third parties.

*Nevada Resident Rights*

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at privacy@peregrine.io with the subject line “Nevada Do Not Sell Request” and providing us with your name. However, we do not currently provide your Personal Data to any third parties.

European Union and United Kingdom Data Subject Rights

*EU and UK Residents*

If you are a resident of the European Union (“**EU**”), United Kingdom (“**UK**”), Lichtenstein, Norway or Iceland please do not attempt to send us Personal Data. We do not currently collect Personal Data of EU or UK residents via the Website, and our products and services advertised on the Website are not available to EU and UK residents at the moment.

Contact Information:

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

* Privacy@peregrine.io
* Peregrine Technologies, Inc

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