



Privacy Policy

Last Modified: July 1, 2020

CA Notice at Collection

Here is a brief summary of Sense360's collection and use of information about Californians. For more detail, please read our [Privacy Policy](#) immediately below this notice.

Data collected through mobile apps published by our partners:

- We collect geolocation information and related technical data in iOS and Android apps. In Android apps, we also collect a list of other installed apps and, in some cases, the Android advertising ID. We also collect responses to our surveys.
- We use this data to draw inferences for market research and to generate survey opportunities, including by improve our proprietary algorithms and other technology. We may help a partner app understand the geolocation data collected in that particular app (such as to understand that it indicates a visit to a specific restaurant brand).

Other data (not collected through partners' mobile apps):

- Like most businesses, we collect contact information (like name, email address, phone number, job title, employer) about current and prospective customers, suppliers and others, as well as any information they provide to us through their communications with us. We also collect commercial information (such as details of transactions with us), and we use cookies and similar technology on our website to collect details about visits to our website and other Internet / electronic network activity information on our website. We may create inferences based on any of this data.
- We use the above data to provide, improve, and maintain, our products and services and to communicate with you.

Privacy Policy

At Sense360, we deeply value your privacy and we go out of our way to help protect it. Our business practices are built on three essential privacy principles:

- (1) We only collect location data from apps that obtained user consent to collect the data
- (2) We take steps to proactively avoid collecting personally identifiable information like names or email addresses through our sensor-intelligence technology — our technology seeks only limited data and optional survey responses linkable to your device
- (3) Our service is designed to ignore records about visits to locations we recognize as sensitive, like doctors' offices.

This privacy policy explains how we uphold these principles when we collect, use, and share information from or about you or your devices. For the purposes of this privacy policy, the terms "Sense360," "we," "us," and "our" refer to Sense360 Inc.

Scope of this Privacy Policy

This privacy policy explains how we collect, use, and share information from or about you or your devices through and sensor-intelligence technology that we provide to other mobile app developers for participation in our data collection program(the "Sense360 Technology") and elsewhere, such as on our website. This



privacy policy does not apply to any other collection or handling of information that may happen in connection with third-party mobile apps, so please also refer to the privacy policy of the application that is using the Sense360 Technology (the “Sense360 Enabled App”).

What does Sense360 do?

Sense360 offers a market research and analytics platform that provides enterprises with a comprehensive understanding of how consumers behave in the marketplace. We collect and process device data from users who consent to location sharing via our partner apps for purposes related to market research. We also field, collect and process surveys on behalf of our customers.

The vast majority of our data is de-identified and is presented to our customers in aggregated format, meaning it cannot be tied back to a specific device or individual.

Sense360 receives location information from an “SDK” (software development kit) that it provides to mobile application partners.

We use the data collected to help marketers to better understand their offline consumers as well as the whole consumer market. The data we provide can be used in multiple use cases such as: competitive intelligence, market-share and consumer preferences.

Sense360 does not sell personal information to any third parties.

Information We Collect

We collect four main types of information from or about you or your devices:

- (1) Information you provide us directly
- (2) Device-related data through the Sense360 Technology
- (3) Other information automatically collected when you visit our website or use our apps.
- (4) Information about you or your devices from third parties.

1) Information You Provide Us

Contact or registration information. If you contact us through our webpage or via email, or create an account for our customer Dashboard, we may ask you to provide your name, email address, phone number, job title and information about your company. We will also collect any information which you provide to us through your communications with us.

2) Information We Collect Through the Sense360 Technology

Sensor data: After you install a Sense360 Enabled App on your device, the Sense360 Technology enables that device to periodically gather and send us data from its GPS receivers, accelerometers, barometers, gyroscopes, magnetometers, and other sensors, including, but not limited to, information about ambient light, Wi-Fi networks, list of installed apps, and details about your device’s location, acceleration, and orientation.

Location data: We may obtain information about your physical location at regular intervals from a Sense360 Enabled App through our analysis of sensor data sent by your device. This may include our use of geolocation features on your device, or by inference from other information we collect, such as nearby Wi-Fi signals or your device’s IP address. You may opt out of this collection as explained in the Privacy Options and Settings section, below.

Survey data: When you use a Sense360 Enabled App, we may present you with surveys that ask questions related to other data we collect or ask you market research questions. These surveys will not ask you to provide any personally identifiable information and your participation in them is completely optional.



Device identifiers. If you have an Android device, we may collect your mobile device's advertising ID. You may opt out of this collection as explained in the Privacy Options and Settings section, below. To keep track of your survey data and the other data we collect from your device, we associate it with a unique number that our Sense360 Technology assigns to your copy of the Sense360 Enabled App. Although it is unique to your device, we do not attempt to personally identify you using this identifier or the advertising ID.

Although we can link the information we collect through the Sense360 Technology to your device, we try to avoid collecting any information through this technology that personally identifies you (like a name or email address). Nevertheless, we cannot guarantee that we will never inadvertently collect such information through the technology, such as if you choose to include it in your response to a survey question.

3) Other Automatically Collected Information

Device information. When you use our services, we receive information about your device, such as web browser characteristics and mobile operating system version.

Usage data. When you use our website or products, we collect information about your activities, such as the pages you view or the features you use.

Cookies and Related Technologies: When you visit our website, we and our third-party service providers receive and record information on our server logs from your browser and from cookies and similar technologies. Cookies are small files containing information. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our website. Please review your web browser's "Help" file to learn the proper way to modify certain cookie settings. Please note that if you delete, or choose not to accept, cookies from our website, you may not be able to utilize the features of our website to their fullest potential. One of the third-party services that we use to track your activity on the Service is Google Analytics. If you do not want Google Analytics to collect and use information about your use of the website, then you can install an opt-out in your web browser (<https://tools.google.com/dlpage/gaoptout/>). You also may opt-out from Google Analytics for Display Advertising or the Google Display Network in a particular browser by using Google's Ads Settings located at <https://www.google.com/settings/ads>.

4) Information Collected From Third Parties.

We may collect information about you or your device from third parties, such as our customers and marketing research partners.

We also collect de-identified transaction data from a third party to complement the data we collect through our partner apps. This data is not linked to a device or specific individual and is not directly linked with any of the data we collect through our partner apps.

How We Use the Information We Collect

We use the information we collect through the Sense360 Technology to:

- Draw inferences about your whereabouts or about activities in which you are then engaged (collectively, "Contextual Inferences").
- Generate analytics or market research reports.
- Improve our proprietary algorithms and other technology.

We use the information provided by you and third parties and other automatically collected information to:

- Provide, improve, and maintain, our products and services.
- Communicate with you.



We may de-identify or aggregate any of the information we collect and use it for any lawful purpose, including marketing purposes.

How We May Share the Information We Collect

- **Non-identifying analytics and research:** We use non-identifying information that we collect across multiple devices and apps to create and share analytics and market research reports and research datasets with our partners or customers for their own business purposes. When we conduct a survey on behalf of a brand, we remove identifying information before sharing responses with the brand.
- **Contextual Inferences:** We may share Contextual Inferences about you with the publisher of your Sense360 Enabled App. We do this by taking the same data that the publisher (our customer) could collect themselves from their own application from the same users, analyzing that data, and then sharing insights about the data with the customer. For example, if we see that location data collected through the customer's app indicates that the user of a particular device visited a particular brand of restaurant five times in the last month, we may tell this to that customer (but not to other customers). We do not give any customer any individual-specific or device-specific or personal information data that we collected in the context of providing our services to a different customer. Please note that the publisher of your Sense360 Enabled App may be able to associate the Contextual Inferences and other linked data with you personally. Please refer to your app publisher's privacy policy before downloading any Sense360 Enabled App.
- **Vendors and service providers:** We may share any information we collect with our vendors and service providers.
- **Legal obligations:** We may access, preserve, and disclose any information we collect if we believe doing so is required or appropriate to (i) comply with laws, law enforcement requests, and legal process, such as a court order or subpoena; (ii) respond to your requests; or (iii) protect your, our, or others' rights, property, or safety.
- **Merger, Sale, or Other Asset Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy or liquidation where the business will not continue as a going concern, receivership, sale of Sense360 assets, or transition of our services to another provider, or in business activities undertaken to prepare for such any such transaction, then any information we collect may be sold or transferred as part of such a transaction or potential transaction as permitted by law and/or contract. The information will then be subject to the recipient's privacy policies (not this one) and any applicable legal requirements.
- We may disclose your information with your permission.

Privacy Options and Settings

- **Location data:** We do not collect location data unless your settings allow your Sense360 Enabled App to access location services on your mobile device. You may stop our collection of location data by turning off location services for your device or for the Sense360 Enabled App, if your device allows you to do so. Please refer to your device's settings or user manual for your device for instructions on how to turn off location services.
- **Advertising identifiers (AdIDs):** You may opt out of our collection of your mobile device's advertising ID by enabling the global interest-based advertising opt-out option appropriate to your device. Please note that opting out via this setting will not affect our use or sharing of any information we have already collected. For more information regarding these Advertising IDs and their options, please visit <https://support.google.com/googleplay/answer/3405269>



- Marketing communications: Each marketing email communication we send to you will contain instructions permitting you to unsubscribe from receiving future marketing communications. You may also contact us as indicated below to have your name removed from our email mailing lists. Please note, however, that on occasion we may send service-related announcements to our customers, such as disruption notifications, via email and you may not be able to opt-out of these communications.

Your Privacy Choices and Opt-Out Rights

Sense360 does not collect any location information or surveys from users who after being informed of the data collection have not given consent.

The vast majority of our App Partners call us out by name in their Privacy Policies. If you are unsure whether one of the apps you downloaded on your phone is working with Sense360, please refer to the app's privacy policy. The App Partners that do not mention Sense360 by name in their Privacy Policy mention that they share location data with third parties for the purpose of market research in their opt-in flow (when you first start using the app) and in their Privacy Policy.

App Partners may also provide ways for you to opt out from or limit their collection of information from and about you. Sense360 is not responsible for the privacy practices of App Partners and other third parties.

Opting-out

If you want Sense360 and/or all other mobile applications on your phone to stop tracking your location information you may follow these steps:

Android: Go to Settings>Location and toggle "Location History" on and off. You can also go to Settings>Location Services which will take you to the Android "Location Access" page where you can turn location access completely off. You can also follow the instructions at <https://support.google.com/nexus/answer/6179507?hl=en> to turn off location permission for particular apps.

iOS: Go to Settings>Tap on your name at the top>iCloud>Share my Location. Tap the toggle next to Share my Location to "Off". You can also follow the instructions at <https://support.apple.com/en-us/HT203033>.

We also offer a way for Sense360 Enabled App to create an in-app opt-out mechanism that is specific to Sense360's collection of data through that app.

Details for California Residents

The California Consumer Privacy Act of 2018 ("CCPA") provides certain rights to residents of California. This section of the Privacy Policy applies if you are a resident of California.

Collection and Disclosure of California Personal Information During Past 12 Months

We describe in the two charts below the categories of California personal information we have collected, and the categories of third parties to whom we have disclosed such information for a business purpose, during the 12 months leading up to the effective date of this Privacy Policy.

Please note, however, that because of certain privacy measures we take, such as avoiding collection of geolocation data that our Sense360 Technology determines may reveal the individual's home address, we understand that the majority of the data we collect through Sense360 Technology, including most geolocation information, could qualify as "de-identified information" and not "personal information" as those terms are defined under the CCPA. We also recognize that there are a wide variety of interpretations of this law, and some may disagree. We believe that this type of data collected through Sense360 Technology is most likely to qualify as "personal information" under the CCPA when it is collected from certain Android devices – specifically, those that transmit their Android advertising ID to us.



Information collected through our Sense360 Technology that is embedded in third-party Sense360 Enabled Apps	
Category of personal information collected	Categories of third parties to which it was disclosed for a business purpose
Geolocation data	Application hosting, data storage, and data backup providers
Commercial information: Survey responses	Application hosting, data storage, and data backup providers
Internet or other electronic network activity information: list of installed apps (Android only), Android ID (Android only), and other technical data about device	Application hosting, data storage, and data backup providers
Inferences drawn from any of the above information	<p>Application hosting, data storage, data backup providers, and, as explained below, the app publisher that provided the data from which the relevant inference was drawn.</p> <p>Contextual Inferences: We may share Contextual Inferences about you with the publisher of your Sense360 Enabled App. We do this by taking the same data that the publisher (our customer) could collect themselves from their own application from the same users, analyzing that data, and then sharing insights about the data with the customer. For example, if we see that location data collected through the customer's app indicates that the user of a particular device visited a particular brand of restaurant five times in the last month, we may tell this to that customer (but not to other customers). We do not give any customer any individual-specific or device-specific or personal information data that we collected in the context of providing our services to a different customer. Please note that the publisher of your Sense360 Enabled App may be able to associate the Contextual Inferences and other linked data with you personally.</p>

Information collected from sources other than Sense360 Enabled Apps	
Category of personal information collected	Categories of third parties to which it was disclosed for a business purpose
Identifiers: Your name, email address, and phone number	Data storage and backup providers, marketing service providers, customer relationship management providers, accounting providers, technical service providers, and other vendors providers



Professional or employment-related information: your title and information about your company	Same as first row
Commercial information: information you provided to us in your communications (some of which is personal information)	Same as first row
Other information described in the Other Automatically Collected Information section above, such as unique cookie identifiers and browsing information (some of which is personal information)	Same as first row
Inferences drawn from any of the above information	Same as first row

Sense360 does not “sell” personal information (as such term is defined under the CCPA). In the 12 months leading up to the effective date of this Privacy Policy, some of the cookies and similar technologies on our website were configured in a way that probably constituted a “sale” of “identifiers,” “commercial information,” and “Internet or other electronic network activity information” to a vendor supporting our website (e.g., “sale” of cookie identifiers and IP addresses of visitors to the site, and a record of the visit to our site, to Google Analytics). We still use Google Analytics, but we have reconfigured our use of cookies and related technologies so that we no longer are engaged in “sales.”

Your CCPA Information & Deletion Rights

The CCPA allows California residents to request us to:

- Inform you about the categories of personal information we collect or disclose about you; the categories of sources of such information; the business or commercial purpose for collecting your personal information; and the categories of third parties with whom we share personal information.
- Delete certain personal information we have about you.
- Provide access to and/or a copy of certain personal information we hold about you.

You also have a right not to receive “discriminatory treatment” (within the meaning of the CCPA) for the exercise of the privacy rights conferred by the CCPA. Note that each of these rights is subject to certain restrictions and exceptions under California law; for example, we may need to retain certain information for record keeping or legal purposes.

Because of the nature of the information we collect from Sense360 Enabled Apps, and the privacy precautions we have taken against making it identifiable, we do not anticipate being able to find your data from such an app, or even determine if we hold any from you, unless you have an Android device and did not deactivate the sharing of your advertising identifier. In that case, we can search our data using your advertising identifier. To find your current Android advertising identifier, open the Google Settings app and navigate to Ads; the identifier should then be visible at the bottom of the screen.

Under the CCPA regulations, a business that has received a consumer’s request for a copy of the specific pieces of personal information held by the business about them must not disclose such information if it cannot sufficiently verify the consumer’s identity. When determining how to verify a California resident’s identity, a business must consider the “risk of harm to the consumer posed by any unauthorized access” and the “likelihood that fraudulent or malicious actors would seek the personal information,” among other factors.



Because you will likely have shared your advertising identifier with many other apps, and with many other third parties that partner with those apps, there are probably a lot of people who have access to your advertising identifier. Anybody who has had possession of your unlocked device for a few seconds could have found it and copied it as well. For that reason, just because somebody knows an advertising identifier does not mean that they own the device. And even if they could somehow prove that they currently own the device (and that they are not, for example, the device owner's abusive ex-boyfriend or nosy roommate), we have no way of knowing who was in possession of the device when its data was collected. For those reasons, to comply with the CCPA regulations and protect the privacy of our users, we do not anticipate honoring requests for copies of specific pieces of information we have collected from Sense360 Enabled Apps.

However, if an individual submits an Android advertising identifier and we can find some data associated with it, we anticipate honoring the first two categories of CCPA requests mentioned above (requests for a description of data-related activities, and requests for deletion), absent extenuating circumstances.

California residents who wish to exercise any of the above privacy rights may submit a request by completing our [CCPA Data Requests Form](#) or emailing us at ccpa@sense360.com. Alternatively, you can make your CCPA request via voicemail at the following number, which is only for use by Californians making CCPA requests: 888-361-4386. No other requests are accepted at that number. For security and legal reasons, Sense360 may not accept requests that require us to access third-party websites or services.

We will take reasonable steps to verify your identity before responding to your request, which may include verifying your Android ID, name, email address or other information that will help us to verify your identity.

If you are an agent making a request on behalf of a consumer, we reserve the right to take steps to verify that you are authorized to make that request, which may include requiring you to provide us with written proof, such as a letter signed by the consumer or a power of attorney. We also may require the consumer to verify their identity directly with us.

Other California Law - Shine the Light Disclosure

The California "Shine the Light" law gives residents of California the right under certain circumstances to request information from us regarding the manner in which we share certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.

Protecting the Information We Collect

We take steps to ensure that your information is treated securely and in accordance with this privacy policy, such as by using encryption in certain situations. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us.

Third Party Privacy Practices

Our website and apps may contain links to third party sites. The policies and procedures described in this privacy policy do not apply to third party sites or activities, nor do they apply to Sense360 Enabled Apps beyond our collection, use, and sharing of information we collect through the Sense360 Technology. Any links to third party sites do not imply that we endorse or have reviewed those sites.

Children's Privacy

We do not knowingly collect, maintain, or use personal information, as defined by the Federal Trade Commission's Children's Online Privacy Protection Act Rule, from children under 13 years of age, and no part of our services is directed to children under the age of 13. If you learn that your child has provided us with personal information without your consent, then you may alert us via our contact information below. If



we learn that we have collected any personal information from children under 13, then we will promptly take steps to delete such information.

International Users

If you are using our services from the European Union or other regions with laws governing data collection and use, then please note that you are agreeing to the transfer of your information to the United States and processing globally. By providing your information to us, you consent to any transfer and processing in accordance with this privacy policy. Please also note that Sense360 Enabled Apps do not send us location data if they detect that the user is outside the United States.

Changes to Our Privacy Policy

This privacy policy is effective as of the “last modified” date at the top of this page. We may need to modify this policy from time to time to reflect changes in the way we collect, use, or share information or changes in privacy-related laws, regulations, or industry standards. Accordingly, we reserve the right to change this policy at any time by posting the revised policy on our website and updating the date at the top of this page.

We encourage you to refer to this policy on an ongoing basis so that you understand our current privacy practices and because we may have no other practical way to notify you of changes to this policy. If revisions to this policy are unacceptable to you, you must cease using any Sense360 Enabled App.

Contact Information

If you have any questions or suggestions, or otherwise would like to contact us, you can reach us via our [Contact Page](#).

Are you a Sense360 employee or job applicant?

[Click here to access Sense360's Employee and Candidate Privacy Policy.](#)