



Column Privacy Policy

Last modified: August 26, 2020

1. Introduction

This Privacy Policy describes how Company collects and uses Personal Data about you through the use of our Website, mobile applications, and through email, text, and other electronic communications between you and Company, Inc.

Column Software, PBC (“**Column**,” or “**we**,” “**our**,” or “**us**”) respects your privacy, and we are committed to protecting it through our compliance with this policy.

This Privacy Policy (our “**Privacy Policy**”) describes the types of information we may collect from you or that you may provide when you visit the website www.column.us (our “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- on our Website;
- in email, text, and other electronic messages between you and our Website;
- when you interact with our advertising and applications on third party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by Column or any third party;
- any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using our Website, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of our Website after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.



2. Children Under the Age of 13

Our Website and Application are not intended for children under the age of 13 and children under the age of 13 are not permitted to use our Website or our Application. We will remove any information about a child under the age of 13 if we become aware of it.

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to or through the Website. We do not knowingly collect Personal Data from children under 13. If you are under 13, do not use or provide any information on our Website or on or through any of its features, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received Personal Data from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from a child under 13, please contact us at leo@column.us or call us at (973) 900-2959.

3. Information We Collect About You and How We Collect It

We collect different types of information about you, including information that may directly identify you, information that is about you but individually does not personally identify you, and information that we combine with our other users. This includes information that we collect directly from you or through automated collection technologies.

Generally

We collect several types of information from and about users of our Website, specifically information:

- by which you may be personally identified, such as name, address, e-mail address, home, work, and mobile telephone numbers, credit or debit card number (for payment purposes only) ("**Personal Data**");
- that is about you such as traffic data, logs, referring/exit pages, date and time of your visit to our Website, error information, clickstream data, and other communication data and the resources that you access and use on the Website; or
- about your Internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- directly from you when you provide it to us;



- automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies; and
- From third parties, for example, our business partners.

Information You Provide to Us

The information we collect on or through our Website is:

- information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, using our Provider consultation services, purchasing products, or requesting further services. We may also ask you for information when you report a problem with our Website;
- records and copies of your correspondence (including email addresses), if you contact us; and
- details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.

You also may provide information to be published or displayed (hereinafter, “**posted**”) on public areas of the Website or transmitted to other users of the Website or third parties (collectively, “**User Contributions**”). Your User Contributions are posted on and transmitted to others at your own risk. You represent and warrant that you will not post any personal information about yourself or other third parties without the appropriate consents and permissions as required by applicable law. You agree that your User Contributions will not contain information prohibited from display or other processing through our Website and Application by applicable law. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, specifically:

- details of your visits to our Website, such as traffic data, location, logs, referring/exit pages, date and time of your visit to our Website, error information, clickstream data, and other communication data and the resources that you access and use on the Website; and



- information about your computer, mobile device, and Internet connection, specifically your IP address, operating system, and browser type.

The information we collect automatically may include Personal Data or we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences, allowing us to customize our Website according to your individual interests;
- recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** We and our service providers may use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with our Website through your computer or mobile device. A cookie is a small file or piece of data sent from a website and stored on the hard drive of your computer or mobile device. On your computer, you may refuse to accept browser cookies by activating the appropriate setting on your browser, and you may have similar capabilities on your mobile device in the preferences for your operating system or browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser or operating system setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Google Analytics.** We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”) to collect certain information relating to your use of the Website. Google Analytics uses “cookies”, which are text files placed on your computer, to help the Website analyze how users use the site. You can find out more about how Google uses data when you visit our Website by visiting “How Google uses data when you use our partners’ sites or apps”, (located at www.google.com/policies/privacy/partners/). For more information regarding Google Analytics please visit Google’s website, and pages that describe Google Analytics, such as www.google.com/analytics/learn/privacy.html.



4. How We Use Your Information

We use your Personal Data for various purposes described below, including to:

- provide our Website or Application to you;
- provide products and services to you;
- provide you with information you request from us;
- enforce our rights arising from contracts;
- notify you about changes; and
- provide you with notices about your account.

We use information that we collect about you or that you provide to us, including any Personal Data:

- to present our Website and its contents to you;
- to provide our products and services to you;
- to provide you with information about Column or its products and services that you request from us or that may be of interest to you;
- to process, fulfill, support, and administer transactions and orders for products and services ordered by you;
- to register, service, and provide you with notices about your Column account;
- to contact you in response to a request;
- 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, including for billing and collection;
- to notify you about changes to our Website or any products or services we offer or provide through them;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

We may also use your information to contact you about goods and services that may be of interest to you, including through newsletters. If you wish to opt-out of receiving such communications, you may do so at any time by clicking unsubscribe at the bottom of these communications or by visiting your Account Preferences page. For more information, see [Choices About How We Use and Disclose Your Information](#).



5. Disclosure of Your Information

We do not share, sell, or otherwise disclose your Personal Data for purposes other than those outlined in this Privacy Policy. We disclose your Personal Data to a few third parties, including:

- third party service providers that we use to support our business;
- to a company we merge, acquire, or that buys us, or in the event of change in structure of our company of any form;
- to comply with our legal obligations;
- to enforce our rights; and
- with your consent.

We do not share, sell, or otherwise disclose your Personal Data for purposes other than those outlined in this Privacy Policy. However, we may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Data that we collect or you provide as described in this privacy policy:

- to contractors, service providers, and other third parties we use to support our business. The services provided by these organizations include providing IT and infrastructure support services, and ordering, marketing, and payment processing services. Payment processing services for our Website are provided by Stripe and are subject to the Stripe Privacy Policy available here: <https://stripe.com/privacy>. Please reference and review the Strip Privacy Policy for information relating to Stripe's collection, use, and disclosure of your Personal Information;
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Column about our Website users are among the assets transferred;
- to fulfill the purpose for which you provide it. For example, we may disclose your personal information to a Provider;
- for any other purpose disclosed by us when you provide the information;
- with your consent.

We may also disclose your Personal Data:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;



- to enforce or apply our [Terms of Use](#) and other agreements, including for billing and collection purposes; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Column, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

6. Choices About How We Use and Disclose Your Information

We offer you choices on how you can opt out of our use of tracking technology, disclosure of your Personal Data for our advertising to you, and other targeted advertising.

We do not control the collection and use of your information collected by third parties described above in [Disclosure of Your Information](#). These third parties may aggregate the information they collect with information from their other customers for their own purposes.

In addition, we strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with control over your Personal Data:

- **Tracking Technologies and Advertising.** You can set your browser or operating to refuse all or some cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our Website may then be inaccessible or not function properly
- **Promotional Offers from Column.** If you do not wish to have your email address used by Column to promote our own products and services, you can opt-out at any time by clicking the unsubscribe link at the bottom of any email or other marketing communications you receive from us or logging onto your Account Preferences page. This opt out does not apply to information provided to Column as a result of a product purchase, or your use of our services.
- **Targeted Advertising.** To learn more about interest-based advertisements and your opt-out rights and options, visit the [Digital Advertising Alliance](#) and the [Network Advertising Initiative](#) websites (www.aboutads.info and www.networkadvertising.org). Please note that if you choose to opt out, you will continue to see ads, but they will not be based on your online activity. We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can also opt out of receiving targeted ads from members of the NAI on its website.



7. Your Rights Regarding Your Information and Accessing and Correcting Your Information

You may review and change your personal information by logging into the Application or Website and visiting your Account Preferences page.

You can review and change your Personal Data by logging into our Website and visiting either the Settings sections of our Website. You may also notify us through the telephone number or email address provided in the [Contact Information](#) below of any changes or errors in any Personal Data we have about you to ensure that it is complete, accurate, and as current as possible or to delete your account. We cannot delete your personal information except by also deleting your account with us. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect.

8. Do Not Track Signals

We currently do not use automated data collection technologies to track you across websites. We currently do not honor do-not-track signals that may be sent by some browsers.

Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they “do not track” your online activities. At this time, we do not honor such signals, but we currently do not use automated data collection technologies to collect information about your online activities over time and across third party websites or other online services (behavioral tracking).

9. Data Security

Information transmitted over the Internet is not completely secure, but we do our best to protect your Personal Data. You can help protect your Personal Data and other information by keeping your password to our Website confidential.

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure. We use encryption technology for information sent and received by us.

The safety and security of your information also depends on you. Where you have chosen a password for the use of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our Website. Any transmission of Personal



Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or in your operating system.

10. Changes to Our Privacy Policy

We will post any changes to our Privacy Policy on our Website. If we make material changes to our Privacy Policy, we may notify you of such changes through your contact information and invite you to review (and accept, if necessary) the changes.

We may change this Privacy Policy at any time. It is our policy to post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on the Website's home page. If we make material changes to how we treat our users' Personal Data, we will notify you by email to the email address specified in your account and/or through a notice on the Website's home page. The date this Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and reviewing this Privacy Policy to check for any changes.

11. Contact Information

You may contact us through the contact information below.

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, you may contact us at the contact information below or through the "Contact Us" page on our Website.

How to Contact Us:

1701 Rhode Island Ave NW
Washington, DC 20036
Telephone: (973) 900-2959
Email: leo@column.us