

## Quorum Privacy Policy

Quorum Analytics Inc. (“**Quorum**”) has created this website and mobile application (the “**Website**”, “**Site**”, or “**Mobile App**”) to provide an online analytical tool that Subscribers can use to generate Derived Analytics related to Legislators and Legislation.

Quorum is committed to maintaining your privacy. This privacy policy and agreement (“**Privacy Policy**”) covers how we collect, use, and treat personal information that you may provide through our Website or while participating in the services we offer at the Website (the “**Services**”). Our Privacy Policy applies to the following visitors to the Website (collectively, “**you**”): casual visitors to our Site, who do not participate in the Services (“**Site Visitors**”). For those visitors (i) who have signed a subscription agreement with Quorum (“**Subscribers**”), or (ii) who visit the Website to participate in a free trial of the Quorum Analytics System after receiving an invitation from Quorum (“**Trial Users**”), their use of this Website is governed by the terms of their subscription agreement. The terms “**Quorum**,” “**we**,” “**us**” and “**our**” refer to Quorum Analytics Inc. having its registered office at 1050 Connecticut Avenue NW, Suite 590, Washington, DC, 20036 (United States of America).

**1. Your Consent.** Please read this Privacy Policy carefully; once you consent to this Policy's terms, it creates legal obligations on you and on Quorum. By accessing and using our Website as a Site Visitor, you are acknowledging that you have read and understood this Privacy Policy and agree to be legally bound by it. If you do not agree with the terms of this Privacy Policy, please refrain from using our Site. You have the right to withdraw your consent to the processing at any time, however, without affecting the lawfulness of processing based on consent before its withdrawal.

**2. The Types Of Information You May Provide.** Information you may provide or that we may collect from you while visiting our Site or while participating in our Services falls into three broad categories: (i) Personally Identifiable Information, (ii) Anonymous Information and (iii) Self-Managed Information. We use the term “**Personally Identifiable Information**” to mean any information that could reasonably be used to identify you directly or indirectly (in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person), including your name, address, e-mail address, telephone number or any combination of information that could be used to identify you. “**Anonymous Information**” is information that does not identify you directly, and may include statistical information concerning, for example, your use of our Services or the pages on our Site that you visit most frequently. “**Self-Managed Information**” is any information, document or personal data which were uploaded to and stored on the Quorum system by you and which is managed by you.

**3. Quorum’s Role.** Quorum acts as data controller with regard to the processing of your Personally Identifiable Information. As regards Self-Managed Information, you decide yourself on the purposes and means of the processing of Self-Managed Information and Quorum therefore acts as a mere processor in respect of this information.

**4. Our Uses Of Personally Identifiable Information (Purposes).** We have structured our Site so that you may visit our Site, and review selected information about our Services, without revealing your identity or providing any Personally Identifiable Information. We will only share

Personally Identifiable Information you choose to provide to us via the Website with third parties as expressly disclosed in Section 8 (We Do Not Disclose Site-Directed, Personally Identifiable Information to Unaffiliated Third Parties; Limited Exceptions). We will not share it in any other way. We collect information from you at different points on our Website and through our Services, and use this information as follows:

**4.1. Site Visitors Do Not Need To Provide Personally Identifiable Information.** As a Site Visitor, you may use our Site without registering or submitting any Personally Identifiable Information to us. In that case, the only information we collect from your visit will be Anonymous Information that does not identify you in any way. Our obligations concerning, and permitted uses of, Anonymous Information are set out below in Section **Error! Reference source not found.** (Anonymous, Aggregate Information).

**4.2. Email Addresses.** You may wish to provide us with comments and feedback concerning our Site generally. By communicating with us for these purposes, you may provide us with your email address and other Personally Identifiable Information. In these instances, we use any information you provide to us strictly for the purposes for which you submit the information.

**4.3. Email List.** Periodically, we may send news, bulletins, marketing materials, or other information to Site Visitors who have signed up for our email list. If you choose to sign up for our email list, you will be required to submit an email address at which we can send our communications. Once you sign up for the email list, you will have the ability to opt out of receiving these communications as provided in Section 11 (Changing or Removing Information; Opting Out).

**5. Anonymous, Aggregate Information.** We use Anonymous Information to analyze the effectiveness of our Site, to improve our Services, and for other similar purposes. In addition, from time to time, we may undertake or commission statistical and other summary analyses of the general behavior and characteristics of users participating in our Services and the characteristics of visitors at our Site. We may collect Anonymous Information through features of the software that supports our Services, through cookies, and through other means described below.

**5.1. IP Addresses; Logs.** Quorum may automatically receive and record information in our server logs from your browser, including your IP address (the Internet address of your computer), your computer's name, the type and version of your web browser, referrer addresses and other generally-accepted log information. We may also record page views (hit counts) and other general statistical and tracking information, which will be aggregated with that of other users in order to understand how our Website is being used, and for security and monitoring purposes.

**5.2. Cookies.** A cookie is a small amount of data, which often includes an anonymous unique identifier, which is sent to your browser from a website's computers and stored on your computer's hard drive. Cookies can be used to provide you with a tailored user experience and to make it easier for you to use a website upon a future visit. We may include cookies on our Website and use them to recognize you when you return to our Website.

Quorum may use one or more of the following types of cookies:

(i) Necessary cookies

Necessary cookies are required for the operation of the Website. These cookies are essential to make the Website work correctly. They include cookies that remember previous actions (e.g. entered text) when navigating back to a page in the same session. These cookies do not identify you as an individual. If you do not accept necessary cookies, it may affect the performance of the Website or parts of it.

(ii) Functionality cookies

Functionality cookies are used to recognize you when you return to the Website and to remember the choices you made to enable Quorum to personalize its content to you. The information the functionality cookies collect may include Personally Identifiable Information that you have disclosed. If you do not accept functionality cookies, it may affect the performance and functionality of the Website and may restrict access to its contents.

(iii) Analytical/Performance cookies

Analytical/performance cookies allow Quorum to recognize and count the number of visitors and help Quorum understand how visitors interact with the Website by providing information about, among others, the areas visited, the time spent on the Website and any issues encountered. This helps Quorum to improve the way the Website works. Performance cookies do not identify you as an individual. All data is collected and aggregated anonymously.

(iv) Advertising/targeting cookies

Advertising/targeting cookies record your visit to the Website, the pages you have visited and the links you have followed. Quorum will use this information to make the Website and the advertising displayed on these sites more relevant to you and your interests. The advertising cookies may be used to deliver targeted advertising and to help Quorum measure the effectiveness of advertising campaigns. Quorum may also share this information with third parties (including advertisers) for this purpose. Most advertising cookies track users via their IP address and may collect Personally Identifiable Information.

In particular, Quorum uses the following cookies:

<b>Cookie used</b>	<b>Role of the cookie</b>	<b>“Lifetime” of the cookie / First or third party cookie</b>	<b>Cookie details</b>
qsesid	Quorum’s first-party session cookie. This cookie identifies your browser to our servers and is required for securely logging in.	Two weeks	Secure cookie; stores no identifiable information on the browser.

current_version	Quorum's first-party software version cookie. This cookie tells our servers which version of our code your browser is running so that we can send you updated code if necessary.	One year	Cookie contains only a 3 or 4 digit code version number (2.4.1.3, for example)
hubspotutk	A third-party cookie installed by the marketing automation company Hubspot. This cookie is used for to keep track of a visitor's identity. This cookie is passed to HubSpot on form submission and used when deduplicating contacts.	Ten years	This cookie is not required for site function.
__hssc	A third-party cookie installed by the marketing automation company Hubspot. Cookie for keeping track of sessions. This is used to determine if we should increment the session number and timestamps in the __hstc cookie. It contains: the domain, viewCount (increments each pageView in a session), session start timestamp.	30 min	This cookie is not required for site function.
__hstc	A third-party cookie installed by the marketing automation company Hubspot. The main cookie for tracking visitors. It contains: the domain,	2 years	This cookie is not required for site function.

	utk (see below), initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session)		
__hssrc	A third-party cookie installed by the marketing automation company Hubspot. Whenever HubSpot changes the session cookie, this cookie is also set. We set it simply to the value "1", and use it to determine if the user has restarted their browser. If this cookie does not exist when we manage cookies, we assume it is a new session.	At end of session	This cookie is not required for site function.
_ga	A third-party cookie installed by Google Analytics. This cookie is used to distinguish users.	2 years	This cookie is not required for site function.
_gid	A third-party cookie installed by Google Analytics. This cookie is used to distinguish users.	24 hours	This cookie is not required for site function.
_gat	A third-party cookie installed by Google Analytics. This cookie is used to throttle the request rate.	10 minutes	This cookie is not required for site function.
_ar_v4	A third-party cookie installed by Google Ads. This cookie is used to distinguish	8 months	This cookie is not required for site function.

	users.		
_adroll	A third-party cookie installed by Adroll Analytics. This cookie is used to distinguish users.	>1 day	This cookie is not required for site function.

If you do not want this Website to store cookies in your browser, you have the option to:

- (i) block cookies or to eliminate the cookies that have already been placed on your browser. Be aware, however, that when you deactivate the cookies a certain number of functionalities will no longer be available on this Website and on certain other websites; and
- (ii) configure your browser to accept or to refuse all cookies, to be alerted when a cookie is issued, to check its period of validity and its consent and to periodically remove your cookies.

**5.3. Tags.** We may use so-called "pixel tags" — small graphic images (also know as "web beacons" or "single-pixel GIFS") — to tell us what parts of our website have been visited or to measure the effectiveness of searches customers perform on our Site. Pixel tags also enable us to send email messages in a format customers can read, and they inform us whether emails have been opened, to help ensure that our messages are of interest to our recipients. You can "opt-out" of receiving these types of emails from us by following the directions provided in Section 11 (Changing or Removing Information; Opting Out). If any Personally Identifiable Information is collected using such tools, it will be subject to the terms of this Privacy Policy.

**5.4. Click-Throughs.** If you have signed up for our email list, we may send you email messages which use a "click-through URL" linked to content on our Website. When you click one of these URLs, you pass through our web server before arriving at the destination web page. We track this click-through data to help determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked, simply do not click text or graphic links in the email, or notify us in accordance with Section 11 (Changing or Removing Information; Opting Out).

**5.5. Computer Configuration.** In order to determine whether your computer is supported by our system, we may collect certain Anonymous Information. This information includes, but may not be limited to, your operating system and browser, as well as the presence of any software that our Website may require to operate with your computer, or other third party software on your computer. This information is kept strictly confidential and is not shared with third parties, except as provided for in this Privacy Policy.

**6. Any Information Linked With Your Personally Identifiable Information Is Protected As "Personally Identifiable Information."** To enable us to better understand the characteristics of our users and/or to provide services tailored to your needs, we may link (a) the Personally Identifiable Information you have provided; with (b) Anonymous Information and

(c) Self-Managed Information. If we combine or link any Anonymous Information or other information with your Personally Identifiable Information, the resulting combination will be treated and protected as Personally Identifiable Information under this Privacy Policy. Accordingly, no unrelated third parties will have access to this information, and any of our service providers who are granted access to this information will be bound to protect it in accordance with this Policy.

7. **Storage.** Your Personally Identifiable Information will be stored for one (1) year after the last use of such information.

8. **We Do Not Disclose Site-Directed, Personally Identifiable Information to Unaffiliated Third Parties; Limited Exceptions.** We will not disclose your Personally Identifiable Information to unaffiliated third parties without your express consent, except in the following limited circumstances:

8.1. **Quorum Site Vendors.** We may employ other companies to perform functions on our behalf, such as hosting or maintaining the Website, providing services related to the Site, collecting information, responding to and sending electronic mail, or other functions necessary to our business. We may need to share your Personally Identifiable Information with these companies (collectively, "**Site Vendors**"). We will provide Site Vendors with only that information necessary to perform their functions, and we will not allow them to use your Personally Identifiable Information for any other purpose.

8.2. **Question of Harm.** We may reveal your Personally Identifiable Information to attorneys, private investigator organizations or law enforcement agencies if we believe (a) that you are in risk of harm from another, or (b) that you are harming or interfering (or will harm or interfere) with others or violating (either intentionally or unintentionally) our Terms and Conditions of Use or otherwise violating legal rights.

8.3. **Legal.** Quorum may be required to disclose your Personally Identifiable Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Quorum will reveal your Personally Identifiable Information to the extent we reasonably believe we are required to do so by law. If we receive legal process calling for the disclosure of your Personally Identifiable Information we will attempt to notify you via the email address you supplied during registration (if applicable) within a reasonable amount of time before we respond to the request, unless such notification is not permitted.

8.4. **Our Affiliates.** We may choose to rely on and share information with our Affiliates as further detailed in Section 17 (Our Affiliates).

8.5. **Transfer of Site.** Quorum shall be entitled to transfer to a third party information it collects, including any Personally Identifiable Information, in connection with a sale of all or substantially all of the assets of the business entity responsible for the information under this Policy, provided the acquiring third party has agreed to safeguard your Personally Identifiable Information with protections that in all material respects are the same as or more protective than those set out in this Privacy Policy.

9. **Your Rights.** You have the right to request from Quorum access to and rectification or erasure of your Personally Identifiable Information or restriction of processing concerning you

or to object to processing as well as the right to data portability. You also have the right to lodge a complaint with a supervisory authority.

Quorum acknowledges that EU individuals have the right to access the Personally identifiable information that we maintain about them. An EU individual who seeks access, or who seeks to correct, amend, or delete inaccurate data, should direct their query to [info@quorum.us](mailto:info@quorum.us). If requested to remove data, we will respond within a reasonable timeframe.

## **10. Your California Privacy Rights.**

### 10.1 California Consumer Privacy Act

The California Consumer Privacy Act (CCPA), effective January 1, 2020, gives California consumers enhanced rights with respect to their Personally identifiable information, including the right to know what Personally identifiable information is being collected, how it is being used, whether their information has been disclosed or sold to third parties, and to whom, to request to delete their Personally identifiable information, and the right to oppose the sale of their information to third parties. Quorum is a covered business under the CCPA as it collects and processes the Personally identifiable information of California consumers as described in this Privacy Policy. This Privacy Policy provides the required notices to California consumers.

For purposes of the CCPA, Quorum does not “sell” the Personally identifiable information of California consumers.

California consumers may submit to us a “request to know” what Personally identifiable information we collect, specifically to know:

- The categories of Personally identifiable information the business collected about the consumer,
- The categories of sources from which Personally identifiable information is collected,
- The business or commercial purpose for which is Personally identifiable information is collected or sold,
- The categories of third parties with whom the business discloses Personally identifiable information,
- The specific pieces of Personally identifiable information the business has collected about the consumer, and
- The categories of the consumer’s Personally identifiable information that were sold or disclosed for business purposes in the 12 months preceding the consumer’s verifiable request.

To submit a “request to know”, email us at [info@quorum.us](mailto:info@quorum.us). Please indicate “Right to Know” in the subject line. In addition, you can submit a request that we delete your Personally identifiable information to the same email address: [info@quorum.us](mailto:info@quorum.us). Please indicate “Request to Delete” in the subject line of your email. In either case, you will need to provide your name and email address to enable us to verify your identify and respond to your request.

We will confirm receipt of a request to know or delete within 10 days along with a description of what steps we take to verify and respond to your request. We are obligated to respond substantively to these requests within 45 days of receipt but can request an additional 45 days for good cause.

### 10.2 California “Shine The Light” Law

Pursuant to California’s “Shine The Light law (California Statute § 1798.983), California residents are entitled, once a year and free of charge, to request the disclosure of certain categories of Personally identifiable information to third parties for their own direct marketing purposes in the preceding

calendar year, if any. You may request this information by contacting us at [info@quorum.us](mailto:info@quorum.us) and indicate in the email subject line, "California Shine The Light Request." Please include your mailing address, state of residence and email address with your request.

### 10.3 California Residents Under the Age of 18

For California residents under the age of 18 and registered users of our Site, California law (Business and Professions Code § 22581) provides that you can request the removal of content or information you posted on the Site. Any such request should be sent to us, along with a description of the posted content or other information to be removed, at [info@quorum.us](mailto:info@quorum.us). Be advised, however, that applicable law may not permit us to completely or comprehensively remove your deleted content or for other reasons as set forth in this California law.

## 11. Do Not Track Notice

Quorum does not currently acknowledge or take action based on Do-Not-Track headers or signals.

**12. Transfer outside of the European Economic Area.** For reasons of access to and functioning of our Website, your Personally Identifiable information may be transferred to Quorum entities outside of the European Economic Area, and more specifically to the United States of America. In order to guarantee your privacy, Quorum has certified to the Department of Commerce that it adheres to the EU-U.S. Privacy Shield Principles, which are also reflected in Quorum's business operations. The Privacy Shield List can be found following the following link: [www.privacyshield.gov](http://www.privacyshield.gov). If there is any conflict between the terms in this Privacy Policy and the EU-U.S. Privacy Shield Principles, the EU-U.S. Privacy Shield Principles shall govern.

Quorum's accountability for personal data that it receives under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, Quorum remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless Quorum proves that it is not responsible for the event giving rise to the damage.

In compliance with the Privacy Shield Principles, Quorum commits to resolve complaints about your privacy and our collection or use of your Personally identifiable information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact at [info@quorum.us](mailto:info@quorum.us).

Quorum has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-privacy-shield/for-eu-consumers/](http://www.bbb.org/EU-privacy-shield/for-eu-consumers/) for more information and to file a complaint.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

Quorum is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

## 13. Changing or Removing Information; Opting Out.

**13.1. Opt-Out.** If you sign up to receive communications from us via our email list, we will provide you with the ability to decline -- or “opt-out of” – receiving such communications. Instructions for opting-out will be provided if and when we determine to send you such a communication. Please understand that you will not be allowed to "opt-out" of formal notices concerning operation of this Website, and legal and other related notices concerning your relationship to the Site. Quorum will also provide an individual opt-out or opt-in choice before we share their data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To limit the use and disclosure of your Personally identifiable information, please submit a written request to [info@quorum.us](mailto:info@quorum.us).

**13.2. Deleting Information.** Finally, if you request, we will remove your name and all other Personally Identifiable Information that you have provided from our databases. Please understand, however, that it may be impossible to remove this information completely, due to backups and records of deletions. In addition, please understand that, if you request deletion of your information, you will be unable to utilize associated features of the Website and any associated Services. You may not remove de-identified, anonymous, or aggregate data from our databases.

**14. Security.** We have put in place security systems designed to prevent unauthorized access to or disclosure of Personally Identifiable Information you provide to us, and we take reasonable steps to secure and safeguard this Information. Our Site's password-protected section requires users to give us unique identifiers such as their user name and password. Quorum employees are required to acknowledge that they understand and will abide by our policies with respect to the confidentiality of Personally Identifiable Information. Additionally, we take steps to require that Quorum's Affiliates and Site Vendors' security policies are at least as protective of your information as our policy. Moreover, we provide access to our databases containing Personally Identifiable Information on a need-to-know basis only.

Our security systems are therefore structured to deter and prevent hackers and others from accessing information you provide to us. We also use software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. Please understand, though, that this information should not be construed in any way as giving business, legal, or other advice, or warranting as fail proof, the security of information provided by or submitted to Quorum. Due to the nature of Internet communications and evolving technologies, we cannot provide, and disclaim, assurance that the information you provide us will remain free from loss, misuse, or alteration by third parties who, despite our efforts, obtain unauthorized access.

**15. Notice of Security Incident.** If we detect, despite the safeguards set out above, an intrusion or other unauthorized access to or use of Personally Identifiable Information (an "**Intrusion**"), we will (i) notify affected users of the Intrusion if the information at issue is sensitive, in our discretion, (ii) deliver this notice by the means we deem most efficient under the circumstances (such as, for example, first class mail or email); (iii) use contact information for each affected user that is current in our files; and (iv) use commercially reasonable efforts to accomplish these steps and effect this notice in a timely manner. To the extent applicable law requires steps in addition to those specified above, we will under all circumstances comply with applicable law.

**16. Participation by Children and Teens; Advisory.** Due to US federal law (as reflected in the Children's Online Privacy Protection Act), WE DO NOT ALLOW INDIVIDUALS WHO WE KNOW ARE UNDER 13 TO PARTICIPATE IN OUR SITE OR SERVICES. YOU MUST BE AT LEAST 13 YEARS OLD

TO USE OUR SITE AND SERVICES. IF YOU ARE BETWEEN 13 AND THE APPLICABLE AGE OF MAJORITY, PLEASE REVIEW THIS AGREEMENT WITH YOUR

PARENT OR GUARDIAN. Please understand that we cannot necessarily tell if a user is providing us with his or her true age.

**17. Information about Public Persons.** In the framework and for the purposes of our Services offering, Quorum collects and further processes publicly accessible or available Personally Identifiable Information of public figures or persons (“**Public Persons**”), including but not limited to legislators, government officials, and European Union staff. Quorum processes Personally Identifiable Information of Public Persons on the basis of its legitimate interest to offer its Services. The Personally Identifiable Information processed on Public Persons include but is not limited to name, surname, title, contact details, social media accounts. The Personally Identifiable Information on Public Persons may, in addition to the recipients referred to in Section 8 (We Do Not Disclose Site-Directed, Personally Identifiable Information to Unaffiliated Third Parties; Limited Exceptions), be disclosed to our Subscribers and Trial Users. With respect to their Personally Identifiable Information, Public Persons have the rights as described under Section 9 (Your Rights). Personally Identifiable Information on Public Persons may be transferred as set out in Section 10 (Transfer Outside of the European Economic Area) and will be stored for as long as such Public Person remains in function.

**18. Notification of Changes.** From time to time, Quorum may change its Privacy Policy. If we make any changes regarding disclosure of Personally Identifiable Information to third parties, we will attempt to contact you prior to the date the modified policy is scheduled to take effect. We will post notice of the new Policy from the privacy link on our Website. With respect to Site Visitors, your use of our Site following any such change constitutes your agreement to follow and be bound by the Privacy Policy, as changed.

**19. Our Affiliates.** We may choose to rely on and share information with companies closely related to us – our "Affiliates" -- for certain purposes under this Privacy Policy. By "Affiliate," we mean an entity that controls, is controlled by, or is under common control with Quorum, whether the control results from equity ownership, contract, overlapping management or otherwise. In this context, "control" means the ability to replace the officers or directors or otherwise materially influence or control management decisions. You agree that Quorum Affiliates will be entitled to enjoy our rights under this Policy and, in exchange, we agree that we will be responsible for our Affiliate's conduct under this Policy, if our Affiliate fails to comply with any resulting obligations. In any event, we ensure that our Affiliates agree to protect Personally Identifiable Information in a manner no less protective of your interests than the protections set out in this Policy.

**20. Relationship to Terms of Use and Other Contracts.** This Privacy Policy must be read in conjunction with our Terms and Conditions of Use, and the provisions of our Terms and Conditions of Use are incorporated herein. To the extent the Terms and Conditions of Use conflict with the terms of this Privacy Policy, the terms of this Privacy Policy will control. If you decide to sign a subscription agreement with Quorum, your use of the Site will be governed by the terms of your subscription agreement and, in the event of a conflict between this Privacy Policy and the terms of your subscription agreement, the subscription agreement will control.

**21. Further Resources.** If you wish further information concerning privacy policies in general, you should visit the following site:

<http://www.ftc.gov/privacy/index.html>

## **22. Contact Us**

If you have any questions about this Privacy Policy, the practices of this Site, or your dealings with this Website, or in case you would like to exercise one of the abovementioned rights, please contact us at:

info@quorum.us

## **23. Effective Date**

The effective date of this Privacy Policy is 31 December, 2019.

## **COPYRIGHT AND LEGAL NOTICE.**

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