



## **Anuvu Privacy Policy**

Effective Date: 1 January 2020

Anuvu takes your privacy seriously.

This Privacy Policy describes how Anuvu Operations LLC, its affiliates and subsidiaries (“Anuvu”, “us”, or “we”) collect, use, and disclose information when users visit the Anuvu websites that link to this Privacy Policy and when individuals use Anuvu’s Services as defined in the Terms of Use (“Services”). If you have any questions or concerns regarding this privacy policy, please contact Anuvu’s Legal and Compliance Department at: [privacy@anuvu.com](mailto:privacy@anuvu.com)

Information regarding the privacy practices of Anuvu and its subsidiaries and affiliates for the Personal Data of job candidates is provided when users submit such job applications.

By using our websites and/or Services, you agree to the terms of this Privacy Policy.

### **(1) WHAT PERSONAL DATA DO WE COLLECT AND PROCESS?**

#### **Personal Data You Provide**

When you use our websites and Services, including our Apps, you may choose to provide information that could reasonably be used to contact you, or to identify you directly or indirectly, or that otherwise relates to your person, such as your name, mailing address, telephone number, email address, and communication preferences (collectively, “Personal Data”). If you pay to use our Services, we collect billing information in order to process those payments. We may also collect the Personal Data you provide when you request information, submit comments, or otherwise communicate and interact with us.

#### **Automatically Collected Personal Data**

When you use our websites and Services, Anuvu and/or our service providers, may use a variety of tools and technologies that automatically collect technical configurations and information about how visitors use our websites and Services (“Usage Information”). The technologies we use to automatically collect information may include, without limitation, cookies, web beacons, and other tracking technologies.

Usage Information includes:

- Browser type and version, operating system, type of device used, device name, IP address, MAC address or other unique identifier for the device used to access the websites and Services,
- Navigation data such as the time, referral source, application use, length of visit, page views, and website domain names. This data provides us with information about the use of our websites and Services, such as how many visitors visit a specific page, how long they stay on that page, and which hyperlinks, if any, they “click” on.

When Anuvu associates Usage Information with a specific individual or household, Anuvu treats it as Personal Data.

**For information about our use of cookies and similar technologies, please see our Cookies Policy at <https://www.anuvu.com/privacy>**

## **(2) HOW WE USE THE PERSONAL DATA WE COLLECT**

We use and store Personal Data we collect about and from you on the following legal basis, and for the purposes identified below.

We will process your Personal Data on our legitimate interest, for the following purposes:

- To manage and operate our websites and provide the Services;
- To communicate with our customers, including responding to requests that you make;
- To protect the security or integrity of our websites and Services, where necessary;
- To improve the features, performance, and support of our websites and Services;
- To provide third parties with anonymous statistical information about our users (this information will not be used to identify directly or indirectly any individual user);
- For disclosure to third companies as part of due diligence processes within business acquisitions or transfers;
- For our own internal record-keeping requirements and administrative purposes;
- To comply with any applicable law, regulation, legal process, or enforceable governmental request;
- To protect against harm to the rights, property or safety of Anuvu, our customers, or the public as required or permitted by law;
- for any other purpose specifically disclosed to you at the time you provide your Personal Data, provided you have given us your prior consent to that particular processing and

- As elaborated upon below, to disclose it to our business partners, suppliers or subcontractors which process Personal Data on our behalf for any of the purposes set out in this Privacy Policy.

Where Anuvu processes Personal Data to meet its legitimate interests, it balances these against data subjects' fundamental rights and freedoms and puts in place robust safeguards to ensure that their privacy is protected.

### **(3) HOW WE SHARE PERSONAL DATA**

Unless you ask or authorize us to do so, or as otherwise stated in this Privacy Policy, we do not trade, rent, sell, or share your Personal Data collected from this website or through your use of the Services with non-affiliated third parties. We may share non-Personal Data, such as aggregate user statistics, demographic information, and Usage Information (to the extent it is not Personal Data) with third parties for any purpose.

We may disclose information about you to our clients, business partners, suppliers or subcontractors (who process data on behalf of Anuvu and not for their own purposes) for the purposes set out in this Privacy Policy. We share your Personal Data with:

#### **Our Airline and Maritime Clients**

Our Services are primarily provided to you through our relationship with our Airline and Maritime clients. If we are providing you with Services through one of our clients, we are collecting your personal data on their behalf as a service provider, data processor, or third party vendor and we will share the Personal Data we collect about you with them. We do not provide your Personal Data to clients other than the client on whose behalf the information was collected.

Each of our clients may use your Personal Data in different ways. As a service provider, Anuvu is not responsible for our Clients' ultimate use of the information we collect. Anuvu recommends that you review the privacy policy of the relevant Client to better understand how they may use your Personal Data.

#### **Third Parties**

In order to carry out your requests, respond to your inquiries, and make various features, services, and materials available to you through our websites and Services, we may share your Personal Data and Usage Information with service providers or third parties that perform functions on our behalf.

Our service providers may include:

- Companies or individuals that host or operate our websites;
- Providers of data analytics regarding traffic and usage of our website;

- Connectivity providers;
- Customer service providers; and
- Payment management companies.

In such cases, these third parties are not entitled to use this information for any other purpose.

We also may disclose your Personal Data for a business purpose to the following categories of third parties:

- Business partners; and
- Internet cookie information recipients as set forth in our Cookies Policy.

Anuvu may also share your Personal Data with its parent entities, affiliates and subsidiaries.

### **Business Acquisitions and Transfers**

If Anuvu or our assets are acquired by or transferred to another company, your Personal Data, and any other information that we have collected about the users of our websites or Services, may be disclosed to that company as part of the due diligence process and transferred to that company as part of the transferred assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use Personal Data you have provided in a manner that is consistent with this Privacy Policy. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

### **Compliance With Law**

We may disclose your Personal Data and other information to third parties, including governmental authorities, to comply with any applicable law, regulation, legal process, or enforceable governmental request, or if we believe in good faith that such disclosure is necessary to protect against harm to the rights, property or safety of Anuvu, our customers, or the public as required or permitted by law (especially in emergency situations).

## **(4) YOUR RIGHTS TO MANAGE YOUR PERSONAL DATA AND DATA RETENTION**

Anuvu may act as either a data controller or a data processor, as defined by the General Data Protection Regulation, with respect to your Personal Data. Generally, Anuvu acts as a data processor when Anuvu collects your Personal Data on behalf of its clients. Anuvu acts as a data controller when it collects Personal Data from its website or when providing services directly to end users.

We offer you choices regarding the collection, use, and sharing of your Personal Data.

You may have the right under applicable law, to verify or access your Personal Data; correct or update your Personal Data when inaccurate or incomplete; ask for its erasure when such Personal Data is no longer necessary for the purposes for which it was collected; restrict the processing of your Personal Data under certain circumstances (in which case we will only retain your Personal Data for the exercise and/or defense of our rights); object to any particular processing operation or activity, having regard to the given circumstances and for reasons related to that particular situation (in which case we will only retain your Personal Data for imperative legitimate reasons or the exercise and/or defense of our rights); or request the portability of any of the Personal Data provided to us (which will allow you to obtain and reuse your Personal Data for your own purposes across different services without hindrance to usability). You may do so by contacting us at the contact information provided below. Please note that unless you state otherwise, we may send any corrected or updated Personal Data to every organization to which your Personal Data has been disclosed in accordance with this Privacy Policy. You also have the right to lodge a complaint with your local data protection authority.

**(5) CALIFORNIA RESIDENT RIGHTS REGARDING PERSONAL DATA UNDER THE CALIFORNIA CONSUMER PROTECTION ACT (CCPA)**

**NO SALE OF PERSONAL INFORMATION**

Anuvu has not sold Personal Data in the preceding twelve (12) months.

**ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS**

You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that companies disclose certain information to you about their collection and use of your Personal Data over the past 12 months. This right of access includes information about:

- The categories of Personal Data we collected about you.
- The categories of sources for the Personal Data we collected about you.
- Our business or commercial purpose for collecting that Personal Data.
- The categories of third parties with whom we share that Personal Data.
- The categories of Personal Data that each recipient received.
- The specific pieces of Personal Data we collected about you.

## **DELETION REQUEST RIGHTS**

You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that a company delete any of your Personal Data that it has collected from you and retained, subject to certain exceptions.

## **ANUVU IS A SERVICE PROVIDER UNDER THE CCPA**

When you use Anuvu's Services, Anuvu is primarily acting as a service provider as defined by the CCPA because Anuvu collects your Personal Data on behalf of one of Anuvu's clients. In certain circumstances, if you submit a verified consumer request to Anuvu, we may instruct you to make that request directly to our client. If Anuvu has collected your Personal Data outside of its role as a service provider, or is otherwise instructed by its client to respond to your request, Anuvu will respond to your verified consumer request accordingly.

## **EXERCISING ACCESS, DATA PORTABILITY, AND DELETION RIGHTS**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at (844) 847-5285 toll free number.
- Visiting [globaleagledsr.ethicspoint.com](http://globaleagledsr.ethicspoint.com)

The verifiable consumer request must:

- Provide sufficient information that allows us to verify, to a reasonably high degree of certainty, that you are the person about whom we collected Personal Data. This may include requesting that you provide us with at least two or more pieces of Personal Data to match against Personal Data about you that we may or may not maintain and which we have determined to be reliable for the purpose of verification.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Data provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

## **AUTHORIZED AGENT**

Only you, or a person you have designated in writing as your authorized agent, or who is registered with the California Secretary of State to act on your behalf, or to whom you have provided power of attorney pursuant to California Probate Code sections 4000 to 4465, (“Authorized Agent”), may make a verifiable consumer request related to your Personal Data. You may also make a verifiable consumer request on behalf of your minor child.

If you wish to have an Authorized Agent make a verifiable consumer request on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected Personal Data.

## **NON-DISCRIMINATION**

You have the right not to receive discriminatory treatment for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you services.
- Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of services.
- Suggest that you may receive a different price or rate for services or a different level or quality of services.

## **OTHER CALIFORNIA PRIVACY RIGHTS**

Websites and Service platforms operated by Anuvu currently do not respond to “do not track” signals or similar mechanisms. California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our Website and Services that are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to [globaleagledsr.ethicspoint.com](mailto:globaleagledsr.ethicspoint.com) or write us to the address listed below.

### **(6) NEVADA RESIDENTS RIGHTS REGARDING PERSONAL DATA**

Nevada residents have the right to submit a verified request directing us not to sell their Personal Data. If you are a Nevada resident, and would like to submit such a request, please send your request to [privacy@anuvu.com](mailto:privacy@anuvu.com).

### **(7) DATA RETENTION**

In accordance with our routine record keeping, we may delete certain records that contain Personal Data you have submitted through our websites or by using our Services. Please note

that we may be required (by applicable law or otherwise) to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). We will keep your Personal Data for as long as we reasonably require to manage your use of our websites and/or Services and those processes actively requested by you (e.g. providing you with any information you may request at any given time) through our website and Services, and also to comply with any legal retention requirements.

## **(8) INTERNATIONAL DATA TRANSFERS**

Personal Data that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this Privacy Policy. Some of these countries may not be recognized as affording an adequate level of data protection by your local data protection authority. To comply with privacy laws in the European Union and other jurisdictions, Anuvu has implemented safeguards in the form of model contracts containing the Standard Contractual Clauses approved by the European Commission that govern our transfer of Personal Data to non-adequate third countries. The conditions of transfer within Anuvu are defined in an intra-company data transfer agreement that incorporates the Standard Contractual Clauses. For more information on international data transfers, you should contact us at the contact information provided below.

## **(9) SECURITY OF YOUR PERSONAL DATA**

We take reasonable technical, procedural and organizational precautions to prevent the loss, misuse, or alteration of your Personal Data. Of course, no information security system can be 100% secure. While Anuvu takes steps to protect the security of your Personal Data, please be aware that we cannot ensure or warrant the security of any Personal Data you transmit to us, and you use this website and our Services and provide us with your Personal Data at your own risk.

## **(10) THIRD-PARTY WEBSITES**

Our websites may contain links to other websites. Our provision of these links is for your convenience and does not signify our endorsement of such other websites. We have no control over, do not review, and cannot be responsible for these outside websites or their content.

These other websites may have their own privacy policies. Please be aware that the terms of our Privacy Policy do not apply to these outside websites. We are not responsible for the privacy policies or practices of third-party websites.

## **(11) CHILDREN**

Our website and Services are not directed to children. We do not knowingly collect or solicit personal data from children under the age of 13 (or other relevant age, as applicable, pursuant to relevant law) through our website, Services and/or Apps. If we become aware that we have

collected personal data from a child under such age, we will promptly delete the information from our records. If you become aware that your child or any child under your care has provided us with Personal Data without your consent, please contact us at the contact information listed below.

#### **(12) CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may be updated from time to time and without prior notice to you, and any changes will be effective immediately upon the posting of the revised Privacy Policy. However, if we make any revisions that materially change the ways in which we use or share the Personal Data we have about you, we will provide notice before the change goes into effect and obtain your consent to any such changes as may be required by law.

#### **(13) HOW TO CONTACT US**

If you have any questions about this Privacy Policy or our processing of your Personal Data, please write to us by email at [privacy@anuvu.com](mailto:privacy@anuvu.com) or Contact Anuvu's Legal and Compliance Department, at Anuvu, 1821 E. Dyer Road, Suite 125, Santa Ana, CA 92705