

## Chisel Analytics Privacy Policy

*Last modified: January 28, 2018*

Chisel Data Analytics, Inc. ("Chisel", "our", "us" or "we") provides this Privacy Policy to inform you of our policies and procedures with respect to the collection, use and disclosure of personal information we receive from users of [www.chiselanalytics.com](http://www.chiselanalytics.com) (the "Site"). This Privacy Policy applies only to information that you provide to us through the Site and does not govern information that is exchanged through other methods. This Privacy Policy may be updated from time to time and you are advised to check back regularly for updates or changes to this Privacy Policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Chisel Terms of Use. As used in this policy, the terms "using" and "processing" information include using cookies on a computer, subjecting the information to statistical or other analysis and using or handling information in any way, including, but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organization.

### DEFINED TERMS

**Consultant.** A Consultant is any person or entity who has logged onto [www.chiselanalytics.com](http://www.chiselanalytics.com), filled out and submitted our Consultant Registration Form, and had his or her account approved by Chisel. Consultants on our Site typically use Chisel to search for project listings, apply to projects, execute projects and receive payment for their services.

**Organization.** An Organization is any person or entity who has logged onto [www.chiselanalytics.com](http://www.chiselanalytics.com), filled out and submitted our Organization Registration form, and had its account approved by Chisel. Organizations on our Site typically use Chisel to post projects, review the credentials of Consultants who have applied to projects and have been recommended by Chisel, select and engage Consultants recommended by Chisel, use the collaborative workspace, find permanent hires, and approve payments.

**Project Listing.** A page created by an Organization that describes a project for which the Organization is looking to hire a Consultant. The Project Listing may contain information such as the duration of the project, estimated hourly rate, a description of the project, suggested pre-requisites and other information. Project Listings are searchable by registered Chisel Consultants and Organizations using the Site's search mechanisms.

### COLLECTION AND USE OF INFORMATION

Our primary goals in collecting information are to provide and improve our Site, services, features and content (together, the "Service") and to enable users to easily navigate the Site.

### PERSONAL INFORMATION

- In the course of registering for or using the Service, whether as a Consultant or an Organization, we may ask you to provide us with, grant us access to, or grant us permission to obtain, certain personally identifiable information that can be used to contact or identify you; Personally Identifiable Information ("PII") may include, but is not limited to, your name, company name, email address, and phone number.
- If you use the Service to make or receive payments, we, or our third-party payment facilitator, Stripe, will also collect certain PII such as credit card information, bank account number, routing number or other financial account information, and billing address.
- We also collect other information that you provide about your use of the Service (e.g., zip code (on its own) and individual preferences) ("Non-Identifying Information"). We collect additional Non-Identifying Information from Organizations in the form of information related to projects posted via the Service (e.g., budget, payment structure, location, description of the project, feedback/rating information). We also collect additional Non-Identifying Information from Consultants about Consultant profiles (e.g., educational information, work experience, skills, hourly pay rates, etc.).

- We use your PII (in some cases, in conjunction with your Non-Identifying Information) mainly to provide the Service, assist you in completing your transactions, and administer your inquiries.
- We may combine your PII with Non-Identifying Information and aggregate it with information collected from other Chisel Users (defined below) to attempt to provide you with a better experience, to improve the quality and value of the Service, and to analyze and understand how our Site and Service are used. We may also use the combined information without aggregating it to serve you specifically, for instance to deliver a product to you according to your preferences or restrictions.
- We may also use your PII to contact you with Chisel newsletters, marketing or promotional materials, recommended consultants, available jobs or projects, and other information that may be of interest to you. If you decide at any time that you no longer wish to receive such communications from us, please follow the unsubscribe instructions provided in any of the communications.
- We may also use your PII to send you e-mail notifications about specific projects you have applied for. The sole purpose of these notifications is to enhance your experience by keeping you apprised of developments when you are applying for projects (as a Consultant) or posting projects (an as Organization) and ensuring that the matching process is smooth and timely. You may opt out of certain of these e-mail notifications, but others are necessary and integral to the proper functioning of our Site and Service.

## LOG DATA

When you visit the Site, whether as a registered user or a non-registered user just browsing the Site (any of these, a "Chisel User"), our servers may automatically record information that your browser sends whenever you visit a website ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser software version or the webpage you were visiting before you came to our Site, pages of our Site that you visit, the time spent on those pages, information you search for on our Site, access times and dates, and other statistics. In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this type of information to increase our Site's functionality and user-friendliness, to better tailor it to our visitors' needs, and to detect suspicious activity. These third-party service providers have their own privacy policies addressing how they use such information. We do not treat Log Data as PII, but we may use it in association with PII, and we may aggregate, analyze and evaluate such Log Data for the same purposes as stated above regarding other Non-Identifying Information.

## COOKIES

Like many websites, we use "cookies" to collect information. A cookie is a small data file that we transfer to your computer's hard disk for record-keeping purposes. We use cookies for two purposes. First, we may utilize persistent cookies to save your e-mail address and login password for future logins to the Site and to track your compliance with our marketplace policies. Second, we may utilize session ID cookies to enable certain features of the Site, to better understand how you interact with the Site and to monitor aggregate usage by Chisel Users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Site and Service and then close your browser. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all portions of the Site or all functionality of the Service.

## PHISHING

Identity theft and the practice currently known as "phishing" are of great concern to Chisel. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your credit card information, your account ID, login password, or national identification numbers

in a non-secure or unsolicited e-mail or telephone communication. For more information about phishing, visit the Federal Trade Commission's website.

## **INFORMATION SHARING AND DISCLOSURE**

Consultant Profiles. If you submit our Consultant Registration Form, your application is approved and you choose to use the Service as a Consultant, your Consultant profile will be created. This profile will be publicly viewable via the Service. Such profile may include information including, but not limited to, name, location, skills, educational information, work experience, certifications/licenses and feedback/rating information. You may edit your Consultant profile via the Edit Profile link when logged in and viewing your profile. Your Consultant Profile will be searchable and viewable by any Chisel User.

Organization Profiles. If you submit our Organization Registration Form, your application is approved and you choose to use the Service as an Organization, your Organization profile will be created. This profile will not be publicly viewable via the Service. Such profile may include information including, but not limited to name, location, or organization name. You may edit your Organization Profile via the Edit Profile link when logged in and viewing your profile. Your Organization Profile is viewable and searchable by any Chisel User when you post a project. However, when you post a project, you will have the option of doing so anonymously, in which case your organization's name will not appear in the project listing ("Project Listing"). If you do not choose to post your project anonymously, all registered Chisel Users will be able to view your organization's name and description, since your organization's name and description will appear in the Project Listing. Chisel Users who are not registered (for example those just simply browsing the site without logging in) will not be able to view your Organization Profile.

## **PROJECTS**

If you choose to post a project via the Service as an Organization, the contents of such Project Listing will be viewable via the Service, but only to Consultants who have paid a membership fee. Project Listings may include information such as budget, location, a description of the project, a brief description of the Organization, Organization feedback rating and timing of project performance.

## **FEEDBACK**

We collect feedback from users about their experience with other users of the Service and specifically about Consultants whose ratings are viewable on the Consultant's profile. Please note that any feedback that you provide via the Service will be viewable via the Service according to the following structure:

## **PROJECT PAGES**

If an Organization selects a Consultant for a project, the project will be launched and a Project Page will be generated. This Project Page will contain information from the profiles of both the Consultant and the Organization who are engaged for the project, including but not limited to, contact information and details about the project. The Project Page will also contain an hour log that will enable the Consultant to record hours spent on the project. This hour log will only be viewable by the Organization who has posted the project and to Chisel administrators. Project Pages will not be made available to anyone other than the Organization who has posted a project and the Consultant who is completing that project.

## **AGGREGATE INFORMATION AND NON-IDENTIFYING INFORMATION**

We may share aggregated information that does not include PII and we may otherwise disclose Non-Identifying Information and Log Data with third parties for industry analysis, demographic profiling and other purposes. Any aggregated information shared in these contexts will not contain your PII.

## **USE OF LOGO IN MARKETING MATERIALS**

We may use your company logo and identify your company as a client on our website and in our marketing materials. We will not mention specifics about the role you have posted on the Site without your prior consent.

## THIRD PARTY SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to improve our Service and to perform Site-related services (e.g., without limitation, maintenance services, database management, web analytics, payment processing, fraud detection and improvement of the Site's features) or to assist us in analyzing how our Site and Service are used. These third parties have access to your PII only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## COMPLIANCE WITH LAWS AND LAW ENFORCEMENT

Chisel cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of Chisel or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable activity.

## BUSINESS TRANSFERS

Chisel may sell, transfer or otherwise share some or all its assets, including your PII, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

## CHANGING OR DELETING YOUR INFORMATION

All registered Chisel Users may review, update, correct or delete the information in their registration profile by contacting us or by making edits while viewing their profiles. If you completely delete all such information or if you delete crucial information such as your education, then your account may become deactivated. If you would like us to delete your account in our system, please contact us at [info@chiselanalytics.com](mailto:info@chiselanalytics.com). We will use commercially reasonable efforts to honor your request; however, your PII may remain in our archives. We may retain an archived copy of your records as required by law or for legitimate business purposes. Please bear in mind that neither you nor Chisel can delete all copies of information that has been previously shared with others on the Site or through the Service.

## SECURITY

Chisel is very concerned with safeguarding your information. The security of your PII is important to us. But remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. When you enter sensitive information (such as credit card number) on our registration or payment screens, that information is encrypted using secure socket layer technology (SSL). In some cases, we also encrypt sensitive information where it is stored on our systems. We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored "personal data" (as defined in applicable state statutes on security breach notification) to you via email or conspicuous posting on this Site in the most expedient time possible and without unreasonable delay, insofar as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

## INTERNATIONAL TRANSFER

The Service is intended for users in the United States of America only. Your information may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide information to us, Chisel transfers information to the United States and processes it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

## **LINKS TO OTHER SITES**

Our Site may contain links to other websites. If you choose to click on a third-party link, you will be directed to that third party's website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other sites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

## **OUR POLICY TOWARDS CHILDREN**

This Site is not directed to persons under 18. We do not knowingly collect personally identifiable information from children under 13. If a parent or guardian becomes aware that his or her child has provided us with PII without their consent, he or she should contact us at [info@chiselanalyticss.com](mailto:info@chiselanalyticss.com). If we become aware that a child under 13 has provided us with PII, we will use commercially reasonable efforts to delete such information from our files.

## **CONTACTING US**

If you have any questions about this Privacy Policy, please contact us by email at [admin@chiselanalytics.com](mailto:admin@chiselanalytics.com)