

Privacy Policy

Last Updated: 2/20/23

This Privacy Policy describes the types of personally identifiable information (PII) / personal data (“Data”) that we may collect from you when you are engaged in our Services and/or visit our Websites, as defined below, which Services and Websites are operated by Telescope LLC, a Maryland limited liability company (“Telescope”, “we”, “our”, or “us”), as well as our practices for collecting, using, maintaining, protecting, disclosing and otherwise processing of those Data.

We highly respect your privacy and are committed to protecting it through our compliance with this Privacy Policy and all applicable laws, including the U.S. federal and state laws, as well as, if and where applicable, the EU General Data Protection Regulation 2016/679 (the “GDPR”). Under the GDPR, you may have certain rights that you will be able to exercise in a way set out in this Privacy Policy.

You can send us feedback, comment, request for support, questions, and other communications related to data privacy via e-mail directed to: policy@telescope.io.

Applicability

This Privacy Policy applies to any communication, collaboration, and other activity which entails processing of the Data via the associated Telescope mobile applications, resource group management tools and platforms, including the Employee Resource Groups and Talent Development platform (collectively, the “Services”), as well as through and on the www.telescope.io and www.affinities.io websites (collectively, the “Websites”) and through other interactions you may have with Telescope (e.g., email, customer service inquiries, user conferences, etc.). If you do not agree with the Policy, do not access or use the Services, Websites, or otherwise interact with Telescope. This Privacy Policy does not apply to any third-party applications or software that integrate with the Services (“Third Party Services”), or any other third-party products, services, or businesses.

Telescope may change this Privacy Policy from time to time. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, we will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, do not engage in the provision of our Services or otherwise interact with Telescope which includes that you shall deactivate your account with us, if any.

Data Subjects

In most cases, our data subjects are employees, members of HR teams, or other professionals under control and responsibility of our customers that order the Services in which such individuals are supposed to be engaged (“Customers”). Please, note that it is the Customer who controls and determines the purposes and means of the processing, including any use, of

any Data we process. Thus, before you commence to use our Services, you have to consult your employer, or another person who is the Customer, about legal bases and other specifics of the processing as between you and the Customer. It is your and Customer's responsibility to have all legal authorization in place permitting the Customer to involve you in the provision of the Services.

Teleskope does not allow use of our Websites and Services, or any other engagement in the Services, by anyone younger than 18 years old. If you learn that anyone younger than 16 has unlawfully provided us with personal data, please contact us and we will take steps to delete such information.

Data Controller and Data Processor

In most cases, it is the Customer who is the data controller with respect to your Data. The Customer may, for example, use the Services to grant you and remove access to a ERG account, assign roles and configure settings, access, modify, export, share and remove any Data, subject to limitations set forth by the law and your contractual arrangements with the Customer, including where necessary relevant consent on your part, as well as otherwise apply its policies to the Services. Teleskope, located at: 10411 Motor City Drive Suite 500, Bethesda, MD 20817, policy@teleskope.io, is the entity who acts as a data processor for the purposes of processing your Data subject to this Privacy Policy.

If you have any questions about specific ERG account settings and privacy practices, please contact the Customer whose ERG account you use. If you have your own account, you can check with your employer's human resources representative or your manager for contact information of your ERG account administrator. If you have received an invitation to join an ERG account groups or events but have not yet created an account, you should request assistance from the Customer that has sent the invitation.

Data Collection

Teleskope may collect and receive Data in a variety of ways:

1. Personal Data from Authorized Users. Customers or individuals granted access to an ERG account by a Customer ("Authorized Users") routinely submit the Data to Teleskope when using the Services. The following Data is collected and stored for purposes of providing Services:
 - Name
 - Profile Picture
 - Email
 - Job Title
 - Office Location
 - Department
 - ERG Membership

2. Personal Data as part of Customer Account Information. To use Telescope Services, Customers and individuals provide Telescope with various information necessary to create a company account such as company domain name, company logo, contact email address, contact name, contact title, contact office location, password and/or similar account details. In addition, Customers that purchase a paid version of the Services provide Telescope (or its payment processors) with billing details such as credit card information, banking information and/or a billing address. Though in most cases that information is business or proprietary information of Customers, rather than personal data, sometimes some personal data may constitute some part of that information.
3. Usage Information as follows:
 - Services Metadata. When an Authorized User interacts with the Services, metadata is generated that provides additional context about the way Authorized Users work and for troubleshooting and reporting purposes. For example, Telescope logs the Website links you interact with, emails sent to you, Services methods invoked.
 - Log data. As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use our Websites or Services and record it in log files. This log data may include the Internet Protocol (IP) address, the address of the web page visited before using the Website or Services, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data.
 - Device information. Telescope collects information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and crash data. Whether we collect some or all of this Other Information often depends on the type of device used and its settings.
 - Location information. We receive information from you, your Customer and other third-parties that helps us approximate your location. For this purpose, we may, for example, use a business address submitted by your employer, time zone provided by your device or browser, or an IP address received from your browser or device to determine approximate location. Telescope may also collect location information from devices in accordance with the consent process provided by your device. We do not use GPS or similar location tracking technologies.
4. Cookie Information. Telescope uses cookies and similar technologies on our Websites and Services. The Websites and Services may also include cookies and similar tracking technologies of third parties, which may collect some Data via the Websites and Services and across other websites and online services. We use the cookies to maintain your session so that we do not have to prompt you for login un-necessarily, to save your preferences and to store data between requests.

6. **Third Party Services.** Customer can choose to permit or restrict its Authorized Users to enable and disable Third Party Services for their ERGs and other Services. Typically, Third Party Services are software and platforms that integrate with our Services which may share with us some personal data of you or other persons. For example, if a Microsoft Teams application is enabled to permit calendar to be integrated to an ERG account, we may receive user calendar entries, along with additional information that the application has elected to make available to Telescope to facilitate the integration. Authorized Users should check the privacy settings and notices of those Third Party Services to understand what data may be disclosed to Telescope. When a Third Party Service is enabled, Telescope is authorized to connect and access any personal data made available to Telescope in accordance with our agreement with the Third Party Provider.
8. **Location & Media.** Subject to your consent as express in the settings of your device, we may get access location or pictures or videos that an Authorized User chooses to provide (such as event picture uploaded from a device, or location information provided to search events nearby).
10. **Data from Third Sources.** Telescope may receive information about organizations, industries, events, and other matters related to our business from affiliates, partners or others that we use to make our Services better or more useful. This information may be in some way used together with other information which may accidentally contain the Data we process. Such information might include general data, such as which IP addresses correspond to zip codes or countries. Or it might be more specific: For example, when creating an event in an ERG account, we will search for nearby locations that match the search string and that are close to the location of the organizer, to allow the organizer to choose a venue for the event.
12. **Additional Information Provided to Telescope.** We may receive Data when submitted to our Websites or if you participate in a focus group, contest, activity or event, apply for a job, request support, interact with our social media accounts or otherwise communicate with Telescope.
14. **Sensitive Data.** We do not seek to collect or otherwise process sensitive data as set out in Article 9 of the GDPR. Furthermore, we encourage you to be particularly careful with sharing such information via the Services, either publicly or via direct messages, or as your account information, since erasure or removal such information from public access or otherwise may not be necessarily guaranteed by us in light of our legitimate interests, such as preserving integrity of communications, and burdens of such erasure or removal.

Purposes of Data Processing

Telescope uses and otherwise processes the Data in furtherance of our legitimate interests in operating our Services, Websites and business. In particular, Telescope may use or otherwise process the Data for the following purposes:

1. To provide, update, maintain and protect our Services, Websites and business. This includes use of the Data to support delivery of the Services, prevent or address service errors, security or technical issues, analyze and monitor usage, trends and other activities or at an Authorized User's request.
3. As required by applicable law, legal process or regulation.
5. To communicate with you by responding to your requests, comments and questions. If you contact us, we may use your Data to respond.
7. To develop and provide search, learning and productivity tools and additional features.
9. Telescope tries to make the Services as useful as possible for specific categories of Authorized Users. For example, we may improve search functionality by using the Data to help determine, rank and make suggestions for event locations based on users currently location, the chose office address or region.
11. To send emails and other communications. We may send you event invitations, event rsvp confirmations, event updates, announcements, messages from administrators and any other activity related to groups that you are a member of and technical or administrative messages via emails or push notifications. We may also contact you to inform you about changes in our Services, our Services offerings, and important Services-related notices, such as security and fraud notices. Some of these communications are considered part of the Services and you may not opt out of them.
13. For billing, account management and other administrative purposes. Telescope may need to contact you for invoicing, account management and similar reasons and we use account data to administer accounts and keep track of billing and payments.
14. To investigate and help prevent security issues and abuse, as well as for compliance with the Terms of Service.

If the Data is aggregated or anonymized so it is no longer reasonably associated with an identified or identifiable natural person, Telescope may use or otherwise process it for any business purpose. We take every reasonable step to ensure that the Data that we process are limited to the personal data reasonably necessary in connection with the purposes set out in this Privacy Policy.

Data Retention

Telescope will retain Data in accordance with a Customer's instructions, including any applicable terms of Customer's use of Services. We will retain your Data in a form that permits identification only for as long as we maintain an ongoing relationship with the Customer, or where your Data are necessary in connection with the lawful purposes set out in this Privacy Policy, for which we have a valid legal basis such as in the following circumstances: (i) for the term necessary to be able to respond to any questions or complaints which may be addressed to us; (ii) for the term necessary to comply with all applicable laws; and (iii) for the duration of

any period necessary to establish, exercise or defend any legal rights or preserve integrity of communications or protection of rights and interests of any person engaged in the Services. Once the periods above have concluded, we will either permanently delete or destroy the relevant personal data, or anonymize them.

Disclosures of Data

With respect to any disclosure or sharing of your Data with any third party, we abide by the following rules and principles:

Customer's Instructions. We follow instructions of our Customers pertaining to the Services, or otherwise lawful on its face. We reserve the right to not follow any such instruction if we have a reasonable doubt as to its validity and legality with respect to the Data of Authorized Users, but in no way do we incur any obligation or responsibility over any instruction if it is done in violation of any applicable law or beyond consent of an Authorized User.

Ordinary Course of Services. We may share and disclose information in the ordinary course of Services: For example, when an Authorized User submits their Data, it may be displayed to other Authorized Users in the same or connected ERG account.

Access by Customers. Members of HR staff, administrators, Authorized Users and other Customer representatives may be able to access, modify or restrict access to the Data. This may include, for example, your employer using Service features to export ERG rosters, event participation, or accessing or modifying your profile details.

Third Party Service Providers and Partners. We may engage third party companies or individuals as service providers or business partners to process the Data and support our business. These third parties may, for example, provide virtual computing and storage services.

We use the following sub processors:

1. Amazon Web Services, for hosting our servers, database, files and caching data.
2. Google, for processing incoming email, for email interactions related to follow-up, troubleshooting issues, for storing documents related to the Services, account on boarding and temporary files used for troubleshooting purposes.

Third-Party Services.

Customer may enable or permit Authorized Users and Customers to enable Third Party Services. When enabled, Telescope may share the Data with Third Party Services. Third Party Services are not owned or controlled by Telescope and third parties that have been granted access to the Data may have their own processing policies and practices. Please check the privacy settings and notices in these Third Party Services or contact the provider for any questions.

During a Change in Telescope's Business.

If Teleskope engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of Teleskope's assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence), some or all Data may be shared or transferred, subject to standard confidentiality arrangements.

Legal Compliance: We may need to share or disclose your Data for the compliance with our legal and regulatory obligations, as well as to protect and defend the rights, property or safety of Teleskope or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.

Consent. We may share Data with third parties when we have consent to do so.

International Data Transfers

For more information on International Data Transfers, please see our Data Privacy Addendum.

Data Subjects' Rights

Individuals located in the European Economic Area, may, if the GDPR directly applies to Teleskope, have certain statutory rights in relation to their Data, such as right of access, right to rectification, right to erasure, right restriction of processing, right to object to processing, right to data portability, right to lodge a complaint with a supervisory authority. Whether or not under the GDPR duty to accommodate your rights, we will try to make possible that you can obtain necessary information using the settings and tools provided in your Services account. If you cannot use the settings and tools, contact your Customer for additional access and assistance.

Contacting Teleskope

Please also feel free to contact Teleskope if you have any questions about this Privacy Policy or Teleskope's practices, or if you are seeking to exercise any of your statutory rights. You may contact us at policy@teleskope.io or at our mailing address below:

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Bethesda, MD 20817