**Insight Partners Online Privacy Policy**

**Effective Date: January 1, 2020**

Insight Venture Management, LLC (“Insight”) is committed to respecting and protecting the privacy of the personal information it collects. Please read this privacy policy carefully to understand what information Insight collects and how it uses and shares that information with others. This privacy policy applies only to this website ([www.insightpartners.com](http://www.insightpartners.com/)), to individuals who interact with certain Insight-sponsored surveys and assessments as described below, and to other websites that link to this privacy policy.

If you are an investor in an Insight Fund, then our investor privacy notice, such as that required by the Gramm-Leach-Bliley Act of 1999, is also applicable to you.

**Website Visitors**

What Information Do We Collect?

Insight and third parties working on our behalf collect personal information that you provide on this Website or on third parties’ websites as designated by Insight that link to this privacy policy, such as through forms you choose to submit to contact us to obtain more information about or register for an event. Personal information may include, but is not limited to:

* Contact information and other identifiers (names, addresses, phone numbers, e-mail addresses, and other data you may provide us so that we can contact you).
* Internet activity information (“cookies,” web server logs, web beacons, and other electronic tools to collect statistical information about your use of this Website and other websites).  For more information about how we collect and process such information, please see “Cookie Policy” below.

For users of the information we collect about you from Criteria Corp., please see “For Users of the Criteria Service” below.

How Do We Use and Share Your Personal Information and Other Information?

Insight and third parties working on our behalf use the information we have about you for internal business purposes, as well as to communicate with you, respond to your requests, enhance our services to you, compile aggregate statistics, and improve this Website. Insight and third parties working on our behalf may also use your information to provide you with information about this Website and its services, and about Insight. To assist us with our use and sharing of your information, information covered by this privacy policy, including information about your use of this Website, may be combined with or enhanced by other information that we have from other online or offline sources.

Insight has a legitimate interest in using the information we collect for the purposes outlined above. Specifically, Insight has a legitimate interest in ensuring that its website continues to function efficiently and effectively, and to enhance the functionality of its website in response to how visitors use the website and collects data to that end. When you submit contact information to receive our newsletters or other communications, we use that data to fulfill your request. We also have a legitimate interest in using data about the individuals who visit this website and the companies for which they work to cultivate business relationships that may benefit Insight or our portfolio companies. For some processing activities, such as communicating with you about opportunities to learn from or work with Insight, we seek your consent to process that data.

We may also share your information with third parties as permitted or required by law, including: (a) with service providers that assist in operating our business; (b) to comply with the law or in response to a subpoena, court order, government request, or other legal process; (c) to produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings; (d) to protect the interests, rights, safety, or property of Insight or others; (e) to enforce any terms of service or other legal disclosures on or related to this Website; (f) in connection with a sale or other transfer of all or some of the assets of Insight and/or in connection with a sale or merger of Insight or any division of Insight; (g) to provide you with the services or products requested by you, and to perform other activities related to such services and products; (h) to operate Insight’s systems properly; or (i) any other sharing with your consent.

We do not, and will not, sell your information to third parties.

**For Users of Insight-Sponsored Surveys**

You may have reached this policy because you are participating in a survey or assessment sponsored by Insight on behalf of one of our portfolio companies (the “Service”), such as the HireSelect program sponsored by Insight in collaboration with Criteria Corporation. Insight is an equity investor in some of the companies that use the Service (the “Employers”), and we process information shared with us to, among other things, monitor and improve the performance and use of the Service. Please read this portion of the privacy policy carefully to understand what information Insight collects, and how it uses and shares that information.

What Information Do We Collect?

Insight collects certain personal information provided by individuals who use the Service. Such personal data includes:

* Contact information (including name, test-event ID, and email address);
* Test results (including score, report or other performance evaluation); and
* Other personal information you may provide as part of the employment application process.

In addition, if you live in the United States, we may also collect demographic or ethnicity information (“sensitive information”) to monitor compliance with applicable non-discrimination laws.  You do not have to submit this sensitive information and, where you have submitted this information and given us consent to use the information, you may withdraw your consent at any time. If you wish to withdraw your consent, please contact us at [datainquiries@insightpartners.com](mailto:datainquiries@insightpartners.com).

Note that we will not share with the Employers any of this sensitive information, except in anonymized and aggregated form. The Employer will never know if you do or do not submit this information, and your decision to provide the information or not, or to consent or not (or to withdraw consent) will play no role in any hiring decisions by the Employer.

How Do We Use and Share Your Personal Data?

Insight and third-parties working on our behalf use the information collected via your use of the Service to:

* Monitor and improve the Service;
* Monitor compliance with applicable non-discrimination and anti-bias laws and requirements; and
* Communicate with you solely in connection with your use of the Service.

Insight has a legitimate business interest in performing these limited processing activities to ensure that the Service continues to perform as expected by Insight and the Employers.  To the extent that certain processing activities, or the processing of certain data, requires us to seek your consent, we have done so — for example, with respect to the sensitive information mentioned above.

Insight may also process or share your information in connection with a sale or other transfer of all or some of the assets of Insight and/or in connection with a sale or merger of Insight or any division of Insight, or to operate Insight’s systems properly.  Insight has a legitimate interest in such processing activities.

Lastly, Insight may share your information with third parties as permitted or required by law, including: (a) to comply with the law or in response to a subpoena, court order, government request, or other legal process; (b) to produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings; (c) to protect the interests, rights, safety, or property of Insight or others; or (d) to enforce any terms of service or other legal disclosures on or related to the test.  To the extent any of this processing takes place, Insight will only perform such processing to the extent necessary for compliance with applicable legal requirements.

**Cookie Policy**

As described above, Insight, third parties working on our behalf, and our partners, including social networking sites, may also place, view, and/or use cookies, web server logs, web beacons, and other electronic tools to collect statistical information about your use of this Website and other websites. Such information may include your device’s IP address, browser type, operating system, computer platform, web pages viewed, the date and time of your visit, the links you click within this Website, the websites used prior to visiting this Website, and whether you have been to this Website before. Insight or such third parties may use such information either on behalf of Insight or for the other parties’ own purposes, including research and analysis, to enhance your experience with this Website, to provide you with certain functions on this Website, to create aggregate and anonymize information about usage of this Website and other websites, etc. Insight may also combine such information with information we collect from other sources — such as company websites and social media — to identify potential opportunities for partnership with other companies. Insight has a legitimate interest in cultivating and building the business-to-business relationships made possible by such data processing.

The collection, use, and disclosure of the information by third parties is governed by their own privacy policies and is not the responsibility of Insight. However, if you have deleted and disabled cookies, these uses will not be possible to the extent they are based on cookie information.

Most browsers are set to accept cookies by default. If you prefer, you can usually set your browser to disable cookies, or to alert you when cookies are being sent. The help function on most browsers contains instructions on how to set your browser to notify you before accepting cookies, disable cookies entirely, or how to disable the collection of geo-location data. You need to set each browser, on each device you use to surf the Web. Similarly, if you connect to the Web from multiple devices (e.g., work and home), you need to set each browser on each device. You may also opt out of our third party partners’ cookies by following the instructions provided by DAA AdChoices – http://optout.aboutads.info/#!/. However, if you disable cookies or refuse to accept a request to place a cookie, it is possible that some parts of this Website will not function properly.

**Security**

To protect your personal information from unauthorized access and use, we use reasonable administrative, technical, personnel, and physical measures. These measures include computer safeguards and secured files and buildings.

**Links to Third-Party Websites**

This Website may contain links to third-party websites, including social networking sites. Since we do not control third-party websites and are not responsible for any information you may provide while on such websites, we encourage you to read the privacy policies on those websites before providing any of your information on such websites.

**Accessing and Updating Your Personal Information**

To access, review, rectify, or delete your name, e-mail address, phone number, or physical address, or your business name, business e-mail address, business address, or business phone number Insight has collected about you that is subject to this policy, please contact us at [contact@insightpartners.com](mailto:contact@insightpartners.com). Please include the following information in all requests: first name, last name, and e-mail address. While Insight will make reasonable efforts to fulfill your request, we also reserve the right to impose certain restrictions and requirements on such access requests, if allowed or required by applicable laws.

**Consent to Transfer of Personal Information to Other Countries**

Some of the uses and disclosures mentioned in this privacy policy may involve the transfer of your personal information to various countries around the world that may have different levels of privacy protection than your country. By submitting your personal information through this Website, you consent to such transfers and to the processing of your personal information in such countries for the purposes described in this privacy policy.

**Your Rights to Under Certain Data Privacy Laws**

European Union Residents

If you are viewing this website from the European Union, under the General Data Protection Regulation (“GDPR”) you have a number of rights with regard to your “personal data” (as defined in the GDPR). For example, you have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing and (in certain circumstances) the right to data portability. If you have provided consent for the processing of your data, you have the right (in certain circumstances) to withdraw that consent at any time; however, such withdrawal will not affect the lawfulness of the processing before your consent was withdrawn. You also have the right to lodge a complaint if you believe that we have not complied with the requirements of the GDPR regarding your personal data. Likewise, if you are a resident of the Cayman Islands, the Cayman Islands’ Data Protection Law, 2017 provides you with certain rights as regards your personal information. To learn more about these rights, make a request for your information, or to lodge a complaint with respect to your personal data, please contact us at [datainquiries@insightpartners.com](mailto:datainquiries@insightpartners.com?subject=Inquiries%2FQuestions%20about%20GDPR).

California Residents

Under the California Consumer Privacy Act (“CCPA”) residents of California have certain rights with regards to their personal information. In particular, if you are a resident of California you have the:

* Right to Know: You have the right to request that we disclose to you the personal information we collect, use, disclose, or sell.
* Right to Request Deletion: You have the right to request that we delete your personal information that we have collected or maintain.
* Right to Non-Discrimination: You will not receive any discriminatory treatment for exercising any of these rights.

To exercise your “right to know” or your “right to request deletion” please contact us at [datainquiries@insightpartners.com](mailto:datainquiries@insightpartners.com) or (212) 230-9200.

Please note that to protect the integrity of our services and to protect your privacy interests, we may need to verify your identity before processing your request. Additionally, the CCPA allows you to exercise these rights yourself or to designate an authorized to make these requests on your behalf. If you choose to have an authorized agent act on your behalf, we may request that your authorized agent have written permission from you to make requests on your behalf and may need to verify your authorized agent’s identity.

**Modifications to this Privacy Policy**

Insight reserves the right to modify this privacy policy at any time by posting the revised version on this Website and updating the effective date. Such changes will be effective upon posting. We encourage you to check this Website frequently to see the current privacy policy in effect and any changes that have been made to it.

**Questions Regarding this Privacy Policy**

If you have additional questions regarding this privacy policy, please contact us at [contact@insightpartners.com](mailto:contact@insightpartners.com?subject=Questions%20Regarding%20Privacy%20Policy).