



twelveNYC ("twelveNYC," "we," "us," or "our") cares about your privacy. We are committed to maintaining your trust by protecting your Personal Information. This Privacy Policy ("Policy") describes how twelveNYC collects, uses, and discloses your Personal Information in connection with the use of our website and any transactions or other products, programs, or services that we offer (collectively our "Services").

Before you use our website or Services, please read this Policy in its entirety, which helps you make informed decisions about your relationship with us.

1. INTRODUCTION

Personal Information. "Personal Information" is data that relates to you and can — either on its own or in combination with other information — identify you as an individual. Personal Information does not include data that has been aggregated or made anonymous such that you can no longer be identified using any means reasonably available to us.

References to "you." In this Policy, "you" means anyone who uses our website or Services.

2. INFORMATION WE COLLECT

The Personal Information that we collect and how we use that information depend on your relationship with us and the requirements of applicable law as described below. We may collect information: that you provide to us directly; about your devices and their location, and your use of our Services, including through cookies, pixels, web beacons, logs and other Internet technologies; that we obtain from other sources.

We may collect the following categories of information:

Contact Information, including your name, mailing address, phone number, email address and other information that enables us to contact you;

Professional Information, including your company name, title, role, team and other information about your profession;

Intellectual Property, including trademarks, logos, and other intellectual property that you own;

Communications. We also collect and store communications, such as e-mail, calendar invitations, any other information you choose to share with us.

3. USE OF PERSONAL INFORMATION

In general, we use your Personal Information to:

contact you about twelveNYC, including news, promotions, and product updates. We ensure that we do not use your Personal Information in ways you would not expect by allowing you to opt out of receiving all such communications and, where required by applicable law, we will not send any such messages without your prior consent; and

comply with our legal obligations. Among other things, we use Personal Information to comply with financial reporting obligations, or court orders, warrants, or subpoenas in accordance with applicable law.

4. SHARING OF PERSONAL INFORMATION

Where required by applicable law, we will only share your Personal Information with particular

third parties with your consent. There may be instances when we disclose your Personal Information to other parties: to comply with the law or respond to legal process or a request for cooperation by a government entity or law enforcement; to detect, limit, and prevent fraud, or verify and enforce compliance with the policies governing our Services; or where otherwise required by law. We share Personal Information in this way either to comply with legal obligations to which we are subject, or to meet our legitimate interests in protecting our business, including from fraud and legal claims.

5. RIGHTS IN YOUR INFORMATION: ACCESS, RECTIFICATION, ERASURE AND RESTRICTION

We value your rights to your data. In accordance with applicable law, you may have the right to (i) request confirmation of whether we store, use or share any of your Personal Information; (ii) obtain access to or a copy of your Personal Information; (iii) receive an electronic copy of Personal Information that you have provided to us, or ask us to send that information to another company (the "right of data portability"); (iv) restrict our uses of your Personal Information or, as described above, object to those uses; (v) seek correction of inaccurate, untrue or incomplete Personal Information; or (vi) request erasure of Personal Information held about you by twelveNYC, subject to certain exceptions prescribed by law. If you would like to exercise any of these rights, please contact us at the e-mail or physical addresses set out in section 10.3 below. We will process such requests in accordance with local laws. To protect your privacy, we will take steps to verify your identity before granting access, or making any changes to your Personal Information.

6. OPT-OUT

You have the right to opt-out of certain uses and disclosures of your Personal Information, as set out in this Policy, and in specific circumstances, for example related to direct marketing. We provide a means to unsubscribe in our marketing-related email communications. Note that we will continue to send transaction-related emails regarding products or services that you have requested following an unsubscribe. We may also need to send you certain communications regarding operation and administration of the Services, and you will not be able to opt out of those communications, e.g., communications regarding updates to our Terms of Use or this Policy.

7. SUPERVISORY AUTHORITY

If you are located in the EU, you may lodge a complaint with a supervisory authority if you believe our processing of your Personal Information infringes applicable law.

8. RETENTION

We will generally retain your Personal Information for as long as you have a relationship with us, and for a period after your relationship with us has ended. When determining how long this retention period will last, we take into account the length of time Personal Information is required to:

- Continue to develop, tailor, upgrade and improve our Services;
- Maintain business records for analysis or audit purposes;
- Comply with record retention requirements under the law;
- Defend or bring any existing or potential legal claims; or
- Address any complaints regarding the Services.

10. OTHER RIGHTS AND IMPORTANT INFORMATION

10.1 COLLECTION OF INFORMATION FROM CHILDREN

Generally our Services are not directed to children under the age of 16, and we do not knowingly collect Personal Information from anyone under the age of 16. Persons over 16 but under 18 years

of age should ask their parents for permission before using the Services or sending any information about themselves to anyone over the Internet. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without parental consent, he or she should contact us as described in section 10.6 below. If we become aware that a child under 16 years old has provided us with Personal Information, we will delete such information from our files.

10.2 CHANGES TO THIS POLICY IN THE FUTURE

Any information that is collected via our website or the Services is covered by the Policy in effect at the time such information is collected. We reserve the right to change, modify, add, or remove portions of this Policy at any time and at our sole discretion.

If we make any material changes to this Policy, we will notify you of those changes by sending you an email or other notification, as required by applicable law, and we will update the "Effective Date" below to indicate when those changes will become effective.

We encourage you to review this Policy periodically to remain informed of how we use and protect your information, and to be aware of any policy changes. Your continued relationship with us after the posting or notice of any amended Policy shall constitute your agreement to be bound by any such changes. Any changes to this Policy take effect immediately after being posted or otherwise provided by twelveNYC.

10.3 QUESTIONS OR COMMENTS

If you have any questions or comments regarding our Policy, please contact:

Brandon Conovitz
Chief of Global Operations
45 Main St. Ste. 615
Brooklyn, NY 11201
brandon@twelveNYC.com

We will address your concerns and attempt to resolve any privacy issues in a timely manner.

Sensitive Information. Because email communications are not always secure, please do not include credit card or other Sensitive Personal Information (e.g., racial or ethnic origin, religion, health, or the like) in your emails to us.

Effective Date: June 20, 2018