

## **Aviva IQ Privacy Statement**

**Last Modified: November 16, 2016**

Aviva Consulting Group, LLC (“Aviva IQ”, “we”, “us”, or “our”) understands that privacy is important. This Privacy Statement applies to information we obtain through this website and associated services (collectively, “Services”).

### **Information We Collect & Store**

We collect and store the following information:

#### **Information You Provide**

When you register and create an account, we collect and store your username for your account. In addition, we store usernames and passwords for third party accounts you link to Aviva IQ.

#### **Message Content**

The Services enable you to send messages to Guests. We store your message content, inclusive of the message wording and send time for each message that we send to your Guests on your behalf. This enables us to accurately assess the effectiveness of The Services, and to make modifications, if needed. We store message content to create a better product for you.

#### **Cookies**

We also use “cookies” to collect information and improve our Services. A cookie is a small data file that we transfer to your device. We may use “persistent cookies” to save your username and password for future logins to the Services. We may use “session ID cookies” to enable certain features of the Services, to better understand how you interact with the Services and to monitor aggregate usage and web traffic routing on the Services. 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 aspects of the Services.

#### **Information from Other Sources**

We may obtain your information, including Personal Information or personal preferences, from third parties such as Airbnb, Inc. or from other Services (as defined below). For example, a Guest may send their contact details or preferences, or contact details or preferences of others in their group, to their host.

#### **Automatically Collected Information**

When you use the Services, we may automatically record certain information from your device by using various types of technology, including web beacons (also known as “clear gifs”). This automatically collected information may include your IP address or other device address or ID, web browser and/or device type, the web sites or search terms that you view before or after you use the Services, the pages or other content you view or otherwise interact with on the Services, the dates and times that you visit, access, or use the Services, and other information collected by our analytics provider. We also may use these technologies to collect information regarding your interaction with email messages or other service features, such as whether you opened a message, or the times at which you marked a task complete on a visual checklist. We may also collect information about you, your Listings, your reservations, or your Guests. This information is gathered from all users, and may be connected with your Personal Information.

We may make certain aggregated, automatically-collected, or otherwise non-personal information available to third parties for various purposes, including: (i) compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our users’ interests, habits, and usage patterns for certain programs, content, services, advertisements, promotions, and/or functionality available through the Services.

## **How We Use Personal Information**

We reserve the right to use some data from your Listings and to evaluate the success of our product.

In the course of using the Services, we may collect personal information that can be used to contact or identify you (“Personal Information”). Personal Information is or may be used:

1. to provide and improve our Services,
2. to administer your use of the Services,
3. to better understand your needs and interests,
4. to personalize and improve your experience, and
5. to provide or offer software updates and product announcements.

If you no longer wish to receive communications from us, please follow the “unsubscribe” instructions provided in any of those communications or reply to any of those communications with the word “unsubscribe”.

## **Analytics**

We may collect some information (ourselves or using third party services) using logging and cookies, such as of your IP address, which can sometimes be correlated with Personal Information. We use this information for the above purposes and to monitor and analyze use of the Services, for the Services’ technical administration, to increase

our Services' functionality and user-friendliness, and to verify users have the authorization needed for the Services to process their requests. As of the date this Privacy Statement went into effect, we use both Inspectlet and Google Analytics. To learn more about the privacy policy of Inspectlet, [click here](#). To learn more about the privacy policy of Google Analytics, [click here](#), and to learn how to opt out of that service [click here](#).

## **Information Sharing and Disclosure**

We display your Personal Information in your profile page and elsewhere on the Services according to the preferences you set in your account. We do not sell your personal information to third parties.

## **Compliance with Laws and Law Enforcement Requests**

We may disclose your information to third parties when we have a good faith belief that disclosure is reasonably necessary to

1. comply with a law, regulation or legal request;
2. protect the safety of any person from death or injury;
3. prevent fraud or abuse; or
4. to protect Aviva IQ's rights.

## **Business Transfers**

If we are involved in a merger, acquisition, debt financing, or sale of all or a portion of our assets or equity, or any similar transaction, or in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets, your information may be transferred as part of that transaction, but we will notify you (for example, via email and/or a prominent notice on our website). We will also notify you of choices you may have regarding your information. We may disclose and use your non-private, aggregated, or otherwise non-Personal Information, such as usage statistics of our Service.

## **Changing or Deleting Your Information**

If you are a registered user, you may review, update, correct or delete your Personal Information by changing your "account settings." If your Personal Information changes, or if you no longer desire our Services, you may update or delete your account by making the change on your account settings. In some cases we may retain copies of your information if required by law. For questions about your Personal Information on our Services, please contact [info@avivaiq.com](mailto:info@avivaiq.com). We will respond to your inquiry within 7 days.

## **Data Retention**

We will retain your information for as long as your account is active or as needed to provide you Services. Thereafter, we may retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Consistent with these requirements, we will try to delete your information quickly upon request. Please note, however, that there might be latency in deleting information from our servers and backed-up versions might exist after deletion. In addition, we do not delete from our servers files that you have in common with other users.

## **Data Security**

When you enter Personal Information on our order forms, we encrypt the transmission of that information using secure socket layer technology (SSL). Please be aware that no security measures are perfect or impenetrable. Although we use certain physical, managerial, and technical safeguards that are designed to improve the integrity and security of Personal Information that we collect and maintain, we cannot and do not guarantee that your Personal Information will not be accessed, viewed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. Additionally, we cannot control the actions of other users with whom you may choose to share your Personal Information. Further, even after Personal Information posted on the Services is removed, caching and archiving services may have saved that Personal Information, and other users or third parties may have copied or stored the Personal Information available on the Service. If you have any questions about security on our website, you can contact us at [info@avivaiq.com](mailto:info@avivaiq.com).

## **Children's Privacy**

Our Service are not directed to children under the age of 13, and we do not knowingly collect Personal Information from children under the age of 13. If you are under 13 years of age, then please do not use or access the Services at any time or in any manner. If we learn that Personal Information has been collected on the Services from a child under 13 years of age, we will take appropriate steps to delete that Personal Information. If you are a parent or guardian and discover that your child under 13 years of age has obtained an account on the Services, please alert us at [info@avivaiq.com](mailto:info@avivaiq.com).

## **International Visitors**

The Services are hosted in the United States. Note that laws vary from jurisdiction to jurisdiction, and so the privacy laws applicable to those countries may not have the same data protection laws as the country in which you initially provided the information. If we transfer your information to other countries, we will protect that information as described in this Privacy Statement.

## **Contacting Us**

If you have any questions about this Privacy Statement, please contact us at [info@avivaiq.com](mailto:info@avivaiq.com) or at 1050 Shell Boulevard, #4296, Foster City, CA 94404.

## **Changes to our Privacy Policy**

This Privacy Policy may change from time to time. By continuing to use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.