

Ponto Software, Inc. Privacy Policy

Last updated: 10/06/2022

Ponto Software, Inc. and its affiliates (“**Ponto**,” “**we**,” “**our**,” and/or “**us**”) value the privacy of individuals who use our mobile application, website, and related services (collectively, our “**Services**”). This privacy policy (the “**Privacy Policy**”) explains how we collect, use, and share information from users of our Services (“**Users**,” “**you**” or “**your**”) to facilitate the protection of our Users and continue to improve our Services. By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes. Beyond the Privacy Policy, your use of our Services is also subject to our [Terms of Service](#).

Information We Collect

We may collect a variety of information from or about you or your devices from various sources, as described below.

A. Information You Provide to Us.

Account Services. When you sign up for an account, register to use our Services, sign up for notifications or updates, or complete our forms, we may ask you for your name, email address, phone number, address, birth date, social security number, drivers’ license, passport and certain financial information, such as debit card number, account number, and routing number.

Communications. If you contact us directly, we may receive additional information about you. For example, when you contact our customer support team, we will receive your name, email address, phone number, the contents of a message or attachments that you may send to us, and other information you choose to provide. If you subscribe to our newsletter, then we will collect certain information from you, such as your email address. When we send you emails, we may track whether you open them to learn how to deliver a better customer experience and improve our Services.

Careers. If you decide that you wish to apply for a job with us, you may submit your contact information and your resume online. We will collect the information you choose to provide on your resume, such as your education and employment experience. If you apply for a job with us through a third-party platform or online job board (such as through LinkedIn or Greenhouse), we will collect the information you make available to us through such third-party platform or online job board.

Payment Information. Your payment-related information, such as credit card or other financial information, is collected by our third-party payment processor on our behalf.

B. Information We Collect When You Use Our Services.

Location Information. We may infer your general location information, for example by using your internet protocol (IP) address.

Device Information. We receive information about the device and software you use to access our Services, including IP address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.

Usage Information. To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, like the pages or other content you view, the searches you conduct, purchases you make, any content you post, and the dates and times of your visits.

Information from Cookies and Similar Technologies. We and our third-party partners collect information using cookies, pixel tags, or similar technologies. Our third-party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services.

Please review your web browser's "Help" file to learn the proper way to modify your cookie settings. Please note that if you delete or choose not to accept cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

Widget Information. Other websites and apps may integrate Ponto's widgets. When you visit a site or app with a Ponto widget embedded, we may receive certain information, including information about the page you visited, your IP address, and other information about your device. Ponto and the widget can recognize you across websites containing Ponto's widgets, and the widget may be used to show personalized content or advertising. We know when you interact with a widget, and websites containing the widgets may receive this information.

C. Information We Receive from Third Parties.

Partners. We may receive information about you from our clients and partners for identity verification and fraud detection and prevention purposes.

Information from Third-Party Services. If you choose to link our Services to a third-party account, we may receive information about you, including your profile information and your photo, and your use of the third-party account. If you wish to limit the information available to us, you should visit the privacy settings of your third-party accounts to learn about your options.

Other Third Parties. We may receive additional information about you from third parties, such as data or marketing partners, and combine it with other information we have about you.

How We Use the Information We Collect

We use the information we collect:

- To provide, maintain, improve, and enhance our Services;
- To understand and analyze how you use our Services and develop new products, services, features, and functionality;
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer support;
- To facilitate the connection of third-party services or applications;
- To generate anonymized, aggregate data containing only de-identified, non-personal information that we may use to publish reports and provide safety updates;

- To send you text messages and push notifications;
- To facilitate transactions and payments;
- To find and prevent fraud, and respond to trust and safety issues that may arise;
- For compliance purposes, including enforcing our Terms of Service or exercising or enforcing other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- For other purposes for which we provide specific notice at the time the information is collected.

How We Share the Information We Collect

Affiliates. We may share any information we receive with our affiliates for any of the purposes described in this Privacy Policy.

Vendors and Service Providers. We may share any information we receive with vendors and service providers retained in connection with the provision of our Services.

Marketing. We do not rent, sell, or share information about you with nonaffiliated companies for their direct marketing purposes, unless we have your permission.

Analytics Partners. We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources. You can learn more about Google’s practices by visiting <https://www.google.com/policies/privacy/partners/>.

As Required by Law and Similar Disclosures. We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others’ rights, property, or safety. For the avoidance of doubt, the disclosure of your information may occur if you post any objectionable content on or through the Services.

Merger, Sale, or Other Asset Transfers. We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets.

Consent. We may also disclose your information with your permission.

Your Choices

Updating Your Information. You can update your account and profile information or close your account by contacting us as at support@ponto.com.

Financial Privacy. For additional information on your rights with respect to nonpublic personal information governed by the Gramm-Leach-Bliley Act, view our U.S. Consumer Privacy Notice [here](#).

California Residents. If you are a California resident, please also review our California Resident Privacy Notice [here](#) for more information about the types of personal information we collect and disclose, as well as how to exercise your rights under California law.

If you choose not to provide us with information we collect, some features of our Services may not work as intended.

Third Parties

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

International Visitors

Our Services are hosted in the United States (“**U.S.**”) and intended for visitors located within the U.S. If you choose to use our Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your information outside of those regions to the U.S. for storage and processing. We may transfer information from the European Economic Area, Switzerland, or the United Kingdom to the U.S. and other third countries based on standard contractual clauses approved in the applicable jurisdiction, or otherwise in accordance with applicable data protection laws. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating our Services. By providing any information, including information, on or to our Site, you consent to such transfer, storage, and processing.

Security

We make reasonable efforts to protect your information by using physical and electronic safeguards designed to improve the security of the information we maintain. However, as no electronic transmission or storage of information can be entirely secure, we can make no guarantees as to the security or privacy of your information.

Children’s Privacy

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of Services directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at support@ponto.com.

Changes to this Privacy Policy

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share personal information previously collected from you through the Services, we will notify you through the Services, by email, or other communication.

Contact Information

If you have any questions, comments, or concerns about our processing activities, please write to us by email at support@ponto.com or by mail at Ponto Software Company, Inc., 155 Montgomery Street, Suite 700, San Francisco, CA 94104.