

Privacy Policy

Effective September 7, 2021

We at Trident Network LLC, including our affiliates or subsidiaries (“Trident”, “we”, “us”, “our”), take the responsibility of protecting your data and privacy very seriously. “You” refers to individuals who access or use the Sites and/or Services, and you may also be referred to as a “user” for purposes of this Privacy Policy. This Privacy Policy (“Policy”) explains what data we collect, why we collect them, how we use them and how you can request to view, delete or amend your Personal Data, as defined by various data protection and privacy laws.

This Policy applies to information that Trident may collect about you in connection with your access and use of the Trident websites located at www.thetridentnetwork.com (together with any other websites and domains operated by us and from which you are accessing this Policy, the “Websites” or “Sites”), our social media pages, mobile apps, and any other products and services offered by Trident (collectively, “Services”), as well as through email messages that we send to you that link to this Privacy Policy, and other communications (for example, customer support requests, surveys, and SMS texts) in which you may provide personal data to Trident. In this Policy, the Websites, any platforms, mobile apps, social media pages, emails, and other electronic locations through which you may interact with Trident to provide your information are collectively referred to as the “Sites.”

IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, PLEASE DO NOT ACCESS OR USE THE SITES OR SERVICES.

“You” refers to individuals who access and use the Sites and/or Services. For example, you may be a client of Trident who accesses and uses the Sites and Services as the host or organizer of an event (“Client”), and with whom Trident has entered into a Service Agreement or other agreement containing separate terms and conditions that govern delivery, access and use of the Sites and Services (a “Client Agreement”). You may be the employee or agent of a Client, who is authorized to access the Sites as an administrator; or you may be a visitor to our Website who is interested in browsing and learning more about Trident.

When we collect information from you, we may be doing so on our own behalf (in which case we will be considered a “controller” of your data), or on behalf of a Trident Client who is using the Services to organize an event and manage other event-related activities (in which case, the Client will be the “controller” and Trident will be considered a “processor” of your data).

Types of Data We Collect

We, including the vendors we use to perform services on our behalf, collect, receive, and develop several categories of data about you depending on the nature of your interactions with us. Categories include:

- **Identifiers:** We may collect your name, e-mail address, mailing address, and telephone number. We also collect account usernames and passwords and a profile image if you provide one in conjunction with a Trident account, Patreon Patron, or Twitch account.
- **Purchase and Preference Information:** We may collect data about your purchases and content you view or listen to.
- **Browser, Usage, and Device Information:** We use tracking tools like cookies and pixels to automatically collect information about your interactions with our Sites, such as your IP address and other unique identifiers for the computer, mobile device, tablet or other device ("Device"), including the hardware model and mobile network information. We collect information about your use of the Sites, including your browser type; operating system; what areas of the Sites you access and for how long; search terms you enter; how long you stay on a page; which hyperlinks and content you click on; and the page served and preceding page views.
- **Demographic and Classification Information:** We may collect your zip code, preferred language for internet browsing, and, if you provide them through your account, your date of birth and gender.
- **Location Information:** We collect data about the general location of your Device when you access or use the Sites.
- **Payment Information:** Our trusted payment processing vendors collect your credit card or debit card details when you make a purchase.
- **We develop Inferences:** Using the other pieces of data collected about you, we may draw inferences about you, reflecting what we believe to be your interests, characteristics, predispositions, and attitudes.

How We Use Your Data

We use the above-referenced categories of data for the following purposes:

- To provide you with our Sites, products, and services.
- To fulfill transactions.
- For marketing purposes. For example, we might use data to provide you with special promotions or offers or tell you about new features or services. We might also use your data to serve you tailored advertising. We also use your data to track the effectiveness of our advertising.
- To respond to your requests or questions. We use data to contact you in response to your feedback or other matters related to our relationship with you (such as about this Privacy Policy or our Terms of Service).

- For analytics purposes and to analyze and improve our Sites, products, and services. For example, we may use your data to make our Sites, services, and products better. We might use your data to customize your experience with us and to conduct research and analysis.
- To comply with our obligations, administer our Sites, and for our internal operations. For example, we use data to administer our website, such as troubleshooting, data analysis, and testing.
- For security, safety, and due diligence purposes. For example, we may use data to protect our company, customers, and business partners and their respective personnel. We may also use data to protect our Sites or our services, as well as to detect and investigate activities that may be illegal or prohibited (such as cyber-attacks or malicious or fraudulent activity).
- For verification purposes. For example, we will use certain pieces of data to verify your identity if you make requests pursuant to this Privacy Policy. The verification steps and the pieces of data that we request may vary depending on the sensitivity and nature of your request.
- As otherwise required, disclosed or permitted by law, or as we may notify you.

We Get Data From Various Sources

We get data about you from various sources, directly and indirectly, including from the following:

- **Directly from you.** For example, we collect data if you sign up to subscribe to our newsletter, sign up for an account, become a Patreon Patron, subscribe to Twitch, upload or send us a podcast, video, or other content, post comments, or contact us. We also collect data you provide if you apply for a job, complete a survey, or otherwise submit information to us.
- **From your Devices.** We use tracking tools like browser cookies and web beacons to automatically collect data from your Devices. We collect data when you interact with our Sites, our online ads, or our emails that we or our vendors send to you. To learn more about what cookies we use, and for a detailed cookie notice, please read our Cookies policy section below.
- **From vendors we hire to work on our behalf.** For example, vendors that host or maintain our Sites or send promotional emails for us may give us data. Payment processing vendors may collect your payment information. Our marketing agencies, advertising technology vendors, analytics providers, and other service providers may also provide us with data about you.

- **From other sources.** We may get data about you from other parties, such as business and marketing partners and social media platforms. If you create an account using your credentials from a social media site, we may get access to certain information from that social media site. From time to time, we might get data about you from our affiliates.
- **We combine data.** We may combine data that we have collected offline with data we collect online. Or we may combine data we get from another party with data we already have. We may also aggregate your data with other users' data to understand preferences and trends over time.

We May Share Your Data With Others

We may share your data as described below:

- **Affiliates:** We may share data with our parent and affiliates within the Trident Network family.
- **Vendors and service providers:** We may share data with vendors and service providers we hire to help us run our business, including those companies that host, protect, or operate our Sites; analyze data; provide customer service; send emails for us; process payments; conduct surveys; help run promotional activities; or provide marketing, analytics, or advertising services.
- **Business partners, advertisers, and advertising companies:** We may share data with, or make data available to, our partners, advertisers, advertising networks, advertising servers, and analytics companies or other third parties in connection with our and their marketing, promotional, and other offers. These third parties may use your data for their own advertising, analytics, planning, market research, or other business purposes. If you connect your Trident account to a third party application or social media platform, we may share your data with that service, and such data may be attributed to your account on the third party platform and published on such service. Likewise, if you log into a third party application with your Trident account, that third party application may have access to certain data such as your Trident playlists and activity. You can send invitations or any other type of communications related to any content created within Trident by using external social networks. In these cases, the data will be processed by such third parties according to their privacy policy and without any possibility for us to exercise any kind of control over the further processing of the data you share.
- **Other users:** Trident offers various ways to find, listen to, and share content. Please be aware that other users of Trident might re-post or otherwise share what you post, as well as information about content that you post. Your name and/or username, profile picture, and your Trident user profile are publicly available to other users. Certain activity on the Sites (e.g., total downloads, total live plays, total likes, and total followers) is made publicly available by default and can be accessed by other users.

- **Business transfers:** As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all or substantially all of our assets, or assets related to the Sites, your data may be disclosed to such entity as part of the due diligence process and may be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such data may be considered an asset of ours and as such may be sold or transferred to third parties.
- **Legal compliance:** We may share data with third parties to comply with a legal obligation; when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our Terms of Service or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of other parties, visitors to our Sites, or the public.
- **Other disclosures:** We may share data for other reasons we may describe to you from time to time as permitted by law.

Trident's role as data controller or processor

As set forth in privacy laws, a company that has access to your data may be considered a data controller or processor.

As a company, Trident is sometimes a data controller and sometimes the processor. The following section details when we are considered a controller and when we are a processor.

As it relates to our marketing website, Trident is a data controller.

When we enter into an agreement with a client organization, Trident assumes the role of a data processor as it pertains to user submissions. We process data as stipulated by the organization. However, we retain the right to use some of the information entered by the end-users for business continuity purposes.

Trident is the controller of any activity by an end-user that affects more than one of our client organizations. We also own usage audit, analytics and similar information about how the users engaged with our platform and services. Such data may include user's contact information and anonymized statistics on the content submitted to our services.

Responsibilities as a controller

As a data controller, Trident will store and retain your data as required by law and as needed for business purposes. We do not sell your data or use it in personally-identifiable formats other than for purposes they were collected for and established in this Privacy Policy.

We provide mechanisms for our users to access, amend or delete their personal data as long as the request is reasonable and in accordance with the laws. See section on data requests for more information.

Responsibilities as a processor

As a data processor, Trident will store and retain your data as required by law and as needed for business purposes. We do not sell your data or use it in personally-identifiable formats other than for purposes they were collected for and established in this Privacy Policy.

We will process the data as stipulated by the data processor in our agreement. We may share data through our APIs or webhooks with other services as directed by the data controller. The responsibility for such transfers resides with the controller.

We will respond to reasonable requests from the controller to access, amend or delete data for an individual user or collective user set as required by the law. Any additional cost incurred to perform such requests will be borne solely by the client in such cases.

Data retention

We will not hold your personal information for any longer than is necessary for the uses outlined above unless we are required to keep your personal data longer to comply with the law and any regulatory requirements.

Your rights as a User

Right to know, rectify and delete personal data

As a user, under data protection legislations, you have the right to know and delete information on you collected by us. You have the right to request the following:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information was collected;
- The categories of personal information about you we disclosed for a business purpose or sold;
- The categories of third parties to whom the personal information was disclosed for a business purpose or sold;
- The business or commercial purpose for collecting or selling the personal information; and
- The specific pieces of personal information we have collected about you.

Under some laws, you may also have rights to do the following:

- The right to have your personal data rectified if it is inaccurate or incomplete;
- The right to request to have your personal data deleted in certain specific circumstances as set out in data privacy laws;
- The right to request to restrict the processing of your personal data in certain specific circumstances as set out in data privacy laws;
- The right to ask us not to process your personal data for marketing purposes or for purposes based on our legitimate interests;
- The right to ask us to not undergo automated decision making; and
- Where you have provided consent, to request to withdraw such consent at any time.

Right to opt-out

If you have consented to receiving marketing communications regarding products and services that we believe may be of interest to you and you later decide that you no longer want to receive this type of marketing or promotional information, you may opt-out at any time by clicking the "Unsubscribe" button at the bottom of the marketing communication or contacting us at trident@thetridentnetwork.com.

You may also submit requests to access, update, correct or delete your Personal Information, to no longer receive communications, or to "opt-out" of certain Services, by contacting us at the above email address.

Right to non-discrimination

You have the right not to receive discriminatory treatment by us as a result of exercising of any of your privacy rights.

Our ability to verify your identity is important to us being able to detect spam submissions and bots. If you chose to not verify your email address, we may be unable to provide the same level of service.

Location of Processing

The data is processed at our operating offices in the United States and in any other places where our service providers are located. Depending on your location, data transfers may involve transferring your data to a country other than your own. The standard of data protection in the United States and in certain other countries where we may process your data is considered by the European Commission to be not adequate when compared to the data protection standards of the European Union and European Economic Area. By using our Sites or Services, you consent to such transfer, storing, and processing.

Links to other websites

This Privacy Policy applies only to the Site and our Services and Products. The Site may contain links to other web sites not operated or controlled by Trident (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third Party Sites. The links from the Site, Services or Products do not imply that Trident endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

Not for Children

Trident is not intended for use by children, especially those under age 13. No one under age 13 is allowed to register for the Service or Sites or provide any personally identifiable information or use our social, community and public discussion areas, photo and video galleries, chats, and elsewhere. Minors between the ages of 13 and 17, inclusive, must obtain the permission of their parent(s) or legal guardian(s) before using the Service or Sites. If your child discloses information about themselves in publicly accessible areas of the Service or Sites, they may get unsolicited messages from other parties. Accordingly, you should tell them not to do so. If you are worried about your children's activities or their privacy on the Service or Sites, we encourage you to contact us at trident@thetridentnetwork.com.

COOKIES

The Site uses certain monitoring and tracking technologies, such as cookies, beacons, pixels, tags, and scripts (collectively, "Cookies") to operate and administer our Site and the Services, making it easier for you to use the Services during future visits and for us to gather usage data on our Site. These technologies are used to provide, maintain, and improve our website and platform, to optimize our offerings, and to provide our visitors, customers, and users with a better experience (for example, to better secure our Services, to identify technical issues, and to monitor and improve the overall performance of our Services).

This page contains information on what Cookies are, the types of Cookies used in connection with using our Services, and how to switch Cookies off in your browser. If you are unable to find the information you were looking for, or if you have any further questions about the use of Cookies in connection with our Services, please email us at trident@thetridentnetwork.com.

What are Cookies?

Cookies are small text files that are stored through the browser on your computer or mobile device (for example, Google Chrome or Safari). They allow websites to store information like user preferences, so that a website can recognize you when you leave and come back and respond appropriately. Cookies are typically classified as either "session cookies", which are automatically deleted when you close your browser or "persistent cookies", which will usually remain on your device until you delete them or they expire.

How do we use Cookies?

We use several different types of Cookies on our website and platform:

- **Performance Cookies:** This type of Cookie helps us to secure and better manage the performance of our Services and remembers your preferences for features found on the Services. This allows you to not have to reset them each time you visit.
- **Analytics Cookies:** Each time you visit our website or use the platform, the analytics tools and services we use generate Cookies, so long as they are allowed and not deleted, that can tell us whether or not you have visited our website or used the platform in the past, and provide additional information regarding how visitors and users use our website or platform (such as how many visitors we have on a certain landing page, how often they visit, or where users tend to click within our website or platform). Your browser will tell us if you have these types of Cookies. If your browser allows new Cookies to be placed, we will typically generate and place new ones.
- **Registration Cookies:** When you register and sign into our Services, we generate Cookies that let us know whether you are signed in or not, and these Cookies let us maintain your login session. Our servers use these Cookies to work out which account on our Services you are signed into and if you are allowed access to a particular area or feature on such account. While you are signed into our Services, we combine information from your Registration Cookies with Analytics Cookies, which we could use to learn, for example, which pages you have visited.

How can you turn Cookies off (or remove them)?

All modern web browsers allow you to change your Cookie settings. You can usually find these settings in the "Options" or "Preferences" menu of your browser. You should use the "Help" or similar option in your browser for more details.

"Do Not Track" Signals

We do not currently use technology that recognizes "do not track" signals from your web browser.

Changes to this Privacy Policy

We reserve the right to make changes to this Privacy Policy at any time by giving notice on this page and possibly, as far as technically and legally feasible, sending a notice to users via any contact information available to us. It is strongly recommended to check this page often, referring to the date of the last modification listed at the top.

Your California Privacy Rights

This privacy statement for California residents describes the rights of Californians under the California Consumer Privacy Act of 2018 ("CCPA"). This supplements the information contained in our main **Privacy Policy** and applies solely to individuals who reside in the State of

California. If you have any questions about the information provided in this privacy statement or our privacy practices, please contact us as at trident@thetridentnetwork.com.

We Do Not Sell Your Personal Information

The CCPA requires us to disclose whether we sell your personal information. We do not sell your personal information.

Categories of Personal Information We Collect

Our Privacy Policy describes the information categories we collect.

Requests to know

If you are a California resident, under certain circumstances in accordance with applicable law, you have the right to request that we disclose to you specific details about your personal information that we have collected, used, disclosed and sold over the past 12 months and/or a copy of your personal information. These details include: (1) the categories of personal information we have collected about you; (2) the categories of sources from which the personal information is collected; (3) the business or commercial purpose for collecting or selling personal information; (4) the categories of third parties with whom we share personal information; (5) the specific pieces of personal information we have collected about you.

Once we receive your request, we will acknowledge it and either respond in accordance with law, ask for additional information to verify your identity, clarify the nature of your request, let you know if we need more time, let you know if we need to charge a fee (such as if requests are manifestly unfounded or excessive, in particular because of their repetitive character, taking into account the administrative costs of providing the information or communication or taking the action requested), or we will inform you if we cannot fulfill any part of your request due to an exception under the law. If we know that your request relates to information we process as a service provider to one of our corporate clients, we will forward your request to the relevant client and cooperate with that client as needed to address your request and/or inform you that your request should be submitted directly to the business on whose behalf we process the information.

Requests to delete

If you are a California resident, under certain circumstances in accordance with applicable law, you have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your valid verifiable request, we will delete, de-identify or aggregate your personal information and direct our service providers to do so, or we will inform you if we cannot fulfill any part of your request due to an exception under the law. If your request relates to information we process as a service provider to one of our clients, we will inform you that your request should be submitted directly to the business on whose behalf we process the information.

The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Please, however, refrain from sending us sensitive personal information.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable request does not require you to create an account with us. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

We will respond to your request within a reasonable timeframe in accordance with applicable law. Any disclosures we provide may only cover the 12-month period preceding the verifiable request's receipt, as required by law.

Information sale and the right to opt-out

If you are a California resident, you have the right to direct a business not to sell your personal information. Please note that Trident does not sell your personal information, so there is no action required from you to opt-out of selling your information.

Non-Discrimination

In accordance with applicable law, we will not discriminate against you for exercising any of your California privacy rights.