



**PRIVACY POLICY**  
**LAST UPDATED AND EFFECTIVE AS OF:**  
**JUNE 24, 2020**

INVNT GROUP, LLC (“Company”, “we”, “our” or “us”) understands that privacy is important to users of our website (“you” or “your”). This Privacy Policy below discloses our practices regarding our collection and processing of data through the websites which are owned, controlled and/or operated by or on behalf of Company, including: www.invntgroup.com, www.invnt.com, www.folkhero.com, www.hevestudios.com and www.meaningglobal.com (collectively, the “Website”).

**OVERVIEW:**

- We collect personal information (as defined herein) only when you voluntarily provide it to us (see Information We Collect and How It Is Collected).
- We collect and use your personal information in order to respond to your requests (e.g., for information regarding our services, to purchase a product or service, etc.).
- We automatically collect information from users of our Website for analytical purposes (see Information We Collect, and Cookies and Other Tracking Technologies).
- We do not sell any of your personal information to third parties and will share it only in limited circumstances as specifically set forth herein.
- You can access, delete and control certain uses of your information as explained below (see Your Rights).

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with this Privacy Policy, you should not use the Website. By accessing or using this Website, you agree to this Privacy Policy. \*If you have questions or would like to contact us for any reason, you can always contact us using the information in the section below titled “Contact”.

**INFORMATION WE COLLECT AND HOW IT IS COLLECTED:**

You are not required to register or provide any personal information (as defined below) in order to browse the Website and learn more about our company and our services and products. We do not collect personal information unless you submit that information to us through the Website, such as when you choose to subscribe to our newsletter or otherwise provide information directly to us or interact with us on the Website. As used herein, the term “personal information” means any information that identifies, relates to, describes, references, or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. We collect the following categories of personal information, and we have collected the following categories of personal information within the last twelve (12) months, for the following purposes:

CATEGORY	PURPOSES FOR WHICH SUCH INFORMATION WAS USED OR WILL BE USED	CATEGORIES OF SOURCES FROM WHICH PERSONAL INFORMATION HAS BEEN COLLECTED	CATEGORIES OF THIRD PARTIES WITH WHOM WE SHARE PERSONAL INFORMATION

Personal contact information (such as name, email address, physical address).	Respond to your requests and enhance our services.	Directly from you. For example, from forms you complete or products and services you purchase.	Except as set forth below in the <i>Cookies</i> section, we do not share your information with any third parties.
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Indirectly from you. For example, from observing your actions on our Website.	Except as set forth below in the <i>Cookies</i> section, we do not share your information with any third parties.

We also collect information directly from you on this website through the use of cookies and similar technologies, as described below in the "Cookies and Other Tracking Technologies" section. As used herein, "personal information" does not include:

- Information that is lawfully made available from federal, state or local government records or
- Deidentified or aggregated information.

*\*IF YOU ARE SITUATED IN THE EU, PLEASE SEE THE SECTION "ADDITIONAL EU DISCLOSURES", THAT PERTAINS TO OUR COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL DATA AND ADDITIONAL RIGHTS YOU HAVE UNDER APPLICABLE LAW.*

**USE AND SHARING OF PERSONAL INFORMATION:** We may use the personal information we collect for the following purposes, and have done so in the past:

- To contact users of the Website regarding our products and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To investigate fraud or violations of law or of any party's rights.
- To our service providers, such as hosting providers and email service providers, but they are only authorized by us to use the information in connection with their performance of services for us.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our users is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

**YOUR RIGHTS:** We provide you with specific rights regarding your personal information. This section describes the rights that you have and explains how to exercise those rights. You can opt-out of receiving communications from us (and/or otherwise, from our processing of your personal information) at any time by emailing us at [it@invnt.com](mailto:it@invnt.com)

**RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED, DISCLOSED OR SOLD**

You have the right to request that we disclose certain information to you about our collection, use,

disclosure or sale of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), and subject to certain limitations that we describe below, we will disclose such information to you. You have the right to request any or all of the following: The categories of personal information we collected about you.

- The categories of sources from which the personal information is collected.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a *data portability request*).

Note - In the preceding twelve (12) months, we have not disclosed or sold your personal information except as set forth in the *Cookies and Other Tracking Technologies* section below.

#### DELETION REQUEST RIGHTS

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 verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. However, we may retain personal information that has been de-identified or aggregated.

#### EXERCISING ACCESS, DATA PORTABILITY, AND DELETION RIGHTS

To exercise the access, data portability, and deletion rights described above, please submit a request to us by emailing us at [it@INVNT.com](mailto:it@INVNT.com).

The request should include your contact information and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. In addition, you should provide sufficient information that allows us to reasonably verify that you are the person about whom we collected the personal information or an authorized representative of that person.

For more information about verification, see *Response Timing and Format* immediately below.

#### RESPONSE TIMING AND FORMAT

We will confirm receipt of your verifiable consumer request within ten (10) days and endeavor to respond within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. In order to protect the security of your personal information, we will not honor a request if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. The method used to verify your identity will depend on the type, sensitivity and value of the information, including the risk of harm to you posed by any authorized access or deletion. Generally speaking, verification will be performed by matching the identifying information provided by you to the personal information that we already have.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request (and will not be made more than twice in a 12-month period). If we cannot comply with a request, or cannot fully comply with a request, the response we provide will also explain the reasons we cannot comply.

**PUBLIC RECORDS:** Please note that if the personal information we possess was lawfully made available to us from federal, state or local government records, then we are not obligated to provide you with the rights listed above with respect to such information.

**NON-DISCRIMINATION:** We will not discriminate against you for exercising any of your rights, including, but not limited to, by denying you goods or services or charging you different prices or rates for goods or services.

**THIRD PARTY LINKS:** As a convenience to you, we may provide links to third party websites, apps or services from within the Website. We are not responsible for the privacy practices or content of these third party sites, and by providing a link we are not endorsing or promoting such third party sites. When you navigate away from our Website, you do so at your own risk. We encourage you to read the policies and terms of every website, app or service you visit.

**SOCIAL NETWORKING SERVICES:** The Website may integrate with or make links available to social networking services. We do not control such services and are not liable for the manner in which they operate. While we may provide you with the ability to use such services in connection with our Website, we are doing so merely as an accommodation and, like you, are relying upon those third party services to operate properly and fairly. You should be aware that personal information which you voluntarily include and transmit online in a publicly accessible blog, social network or otherwise online may be viewed and used by others. We are unable to control such uses of your personal information, and by using such services you assume the risk that the personal information provided by you may be viewed and used by third parties.

**COOKIES AND OTHER TRACKING TECHNOLOGIES:** We or our third party partners may store some information on your device or device hard drive as a "cookie" or similar type of file (such as clear gifs, web beacons, tags, and similar technologies that work on mobile devices) to collect data related to usage of the Website and for the purpose of facilitating and enhancing your communication and interaction with the Website. Such data may include, without limitation, the address of the websites you visited before and after you visited the Website, the type of browser you are using, your Internet Protocol (IP) address, what pages in the Website you visit and what links you clicked on, and geolocation data. We use this information to help us maintain and enhance the efficiency and usefulness of the Website and may use it and other non-personally identifiable information for the purposes described in this Privacy Policy, such as to serve targeted advertising to you. However, some of the information we collect may include data, such as IP address data or the identifiers associated with your device that are unique to your computer or device (e.g., IDFA for iOS and Android ID for Android). On occasion, the Website may also set a "session cookie" which helps us administer the Website. The session cookie expires when You close Your browser and does not retain any information about you after it expires.

**CLICKSTREAM DATA** – As you use the Internet, a trail of electronic information is left at each website you visit. This information, which is sometimes referred to as "clickstream data," can be collected and stored by a website's server. Clickstream data can tell us the type of device and browsing software you use and the address of the website from which you linked to the Website. We may collect and use clickstream data to anonymously determine how much time visitors spend on websites, how visitors navigate throughout websites and how we may tailor our Website to better meet consumer needs. This information will be used to improve our Website. Any collection or use of clickstream data will be anonymous, and will not intentionally contain any information that can identify you.

**PIXELS** – We and our service providers may also use so-called "pixel tags," "web beacons," "clear GIFs" or similar means (collectively, "Pixel Tags") in connection with some Website pages and HTML-formatted e-mail messages to track your use of the Website in order to provide you with more useful information and a more personalized experience the next time you visit. A Pixel Tag is an electronic image, often a single pixel (1x1), that is ordinarily not visible to Website visitors and may be associated with cookies on the visitors' hard drives. Pixel Tags allow us to count users who have visited certain pages of the Website, to deliver branded services, and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted e-mail messages, Pixel Tags can tell the sender whether and when an e-mail has been opened.

Cookies and similar items are not used by us to automatically retrieve information that can identify you from your device without your knowledge. Please be advised that certain third parties that are beyond the scope of this Privacy Policy may collect information in connection with the Website. We are not responsible for the acts or omissions of such third parties.

We use Google Analytics and/or Lead Forensics to analyze the usage of the Website. The information generated by the cookie about your use of the Website is transmitted to and stored by Google and/or Lead Forensics on servers in the United States. Google and/or Lead Forensics will use this information for the purpose of evaluating your and other users' use of the Website, compiling reports for us on Website activity and providing other services relating to activity and usage. Google and/or Lead Forensics will collect and use information for such purposes pursuant to its own policies. We are not responsible for the policies or acts of Google or Lead Forensics (including without limitation, how they process your information). You can find more information on Google Analytics in Google's privacy policy located at <https://policies.google.com/privacy>, and on Lead Forensics' software product in Lead Forensics' privacy policy located at <https://www.leadforensics.com/privacy-policy/>.

If you want to stop or restrict the placement of cookies or flush any cookies that may already be on your computer or device, please refer to and adjust your web browser preferences. Further information on cookies is available at [www.allaboutcookies.org](http://www.allaboutcookies.org). By deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our Website or some of its functionality may be affected. Cookies and similar items are not used by us to automatically retrieve information that can identify you from your device without your knowledge.

**DATA SECURITY:** We maintain reasonable security procedures to help protect against loss, misuse, unauthorized access, disclosure, alteration or destruction of the information you provide to us. Please note that no data transmission or storage can be guaranteed to be 100% secure due to the inherent open nature of the Internet. As a result, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and cannot be responsible for the theft, destruction, or inadvertent disclosure of your information.

**DATA RETENTION:** We will retain your information for as long as your account or inquiry is active or as needed to provide you with access to the Website and/or other services and for a reasonable time thereafter in accordance with our standard procedures or as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements. Even if we delete some or all of your personal information, we may continue to retain and use aggregate or anonymous data previously collected and/or anonymize or aggregate your personal information.

**INFORMATION RELATING TO CHILDREN:** Our Website is not intended for children under 13 years of age. No one under age 13 may provide any individually identifiable information through the Website. We do not knowingly collect individually identifiable information from children under 13. If you are under 13, do not use or provide any individually identifiable information on this Website. If we learn we have collected or received individually identifiable information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any individually identifiable information from or about a child under 13, please contact us at [it@INVNT.com](mailto:it@INVNT.com).

**PRIVACY POLICY UPDATES:** We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time by posting the modified policy on this page, provided that any such modifications will only be applied prospectively. We encourage you to periodically review the Website for the latest information on our privacy practices. Your continued use of the Website following the posting of any changes to this Privacy Policy means you accept such changes.

**CONTACT:** For questions or concerns relating to this Privacy Policy or your information, we can be contacted at: [it@INVNT.com](mailto:it@INVNT.com).

## **ADDITIONAL EU DISCLOSURES**

IF YOU ARE SITUATED IN THE EU, THIS SECTION APPLIES TO OUR COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL DATA AND ADDITIONAL RIGHTS YOU HAVE UNDER APPLICABLE LAW.

#### LEGAL BASIS:

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where you have consented to a certain use of your personal data.
- Where we need to comply with a legal or regulatory obligation.

To the extent permitted under applicable laws, we will also process, transfer, disclose and preserve personal data when we have a good faith belief that doing so is necessary.

#### DATA CONTROLLER:

We are the data controller of all personal data collected through our Website. To contact us, please see the section titled "Contact".

Please contact us if you have any complaints or concerns regarding our privacy practices. If you have a complaint, please contact our privacy manager: [it@INVNT.com](mailto:it@INVNT.com). If you are situated in the EU and have any complaints regarding our privacy practices, you have the right to make a complaint at any time to your local supervisory authority.

#### PROVISION OF PERSONAL DATA AND FAILURE TO PROVIDE PERSONAL DATA:

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may not be able to provide certain services to you.

#### COLLECTION OF PERSONAL DATA FROM THIRD PARTY SOURCES:

We may obtain personal data and other information about you through our third party partners who help us provide our products and services to you. We will obtain cookie data about you from Google Analytics.

#### WITHDRAWING YOUR CONSENT:

If we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time by contacting us at [it@INVNT.com](mailto:it@INVNT.com).

#### DATA TRANSFER:

We may transfer personal data from the EU to the USA and other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

#### USE OF YOUR PERSONAL DATA FOR MARKETING PURPOSES:

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

- Promotional offers from us: We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or used our services and, in each case, you have consented to our use of your personal data for marketing purposes.
- Third-party marketing: We will get your express opt-in consent before we share your personal data with any company outside our company for marketing purposes.

#### DATA SUBJECT RIGHTS:

If you are situated in the EU, under the General Data Protection Regulation ("GDPR"), as a data subject, you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

To exercise your rights under the GDPR, please contact us at [it@INVNT.com](mailto:it@INVNT.com). Please note that in order for you to assert these rights, we may need to verify your identity to confirm your right to access your personal data. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. In order to verify your identity, we may need to gather more personal data from you than we currently have.