

Privacy Policy

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OUR COMMITMENT TO PRIVACY

Hello Prosper Inc., operating as “Prosper” (“**Prosper**”, “**we**”, or “**us**”) is committed to respecting and protecting your privacy. Prosper has developed this privacy policy (“**Privacy Policy**”) to help to protect your personal information. This Privacy Policy explains how we gather and use your information and applies to any user using the Site or Services (as hereinafter defined) who uses our web site located at <http://www.helloprosper.com>, applications, widgets, ads, and commerce services, or any service Prosper makes available to you, (the “**Services**”) or any individuals, business partner-specific, merchant-specific, city-specific, or other area-specific web sites we offer that link to or reference this Privacy Policy (collectively, the “**Site**”) and when you receive electronic communications from us.

Please read this Privacy Policy carefully and review it periodically for the latest information about our privacy practices. **By using the Site or the Services, you agree to the terms of this Privacy Policy and consent to the use of your information by Prosper as set forth herein. If you do not agree with the practices described in this Privacy Policy, please do not provide us with your personal information or interact with the Site and/or Services.**

We will routinely update this Privacy Policy to clarify our practices and to reflect new or different privacy practices, such as when we add new services, functionality or features to the Site. If we make any material changes, we will notify you by e-mail (sent to the e-mail address specified in your account) or by means of notice on the Site prior to the change becoming effective. You can determine when this Privacy Policy was last revised by referring to the date it was “Last Updated” above. If you do not agree to the revised Privacy Policy, please stop using the Site and/or Services.

THE INFORMATION WE COLLECT

We collect only personal information that is relevant and necessary to the purpose of the Site and Services. This information allows us to provide you with a customized and efficient experience. We collect the following types of information from our users:

A. Personally Identifiable Information

We receive and store any information you enter on our Site, uploaded through our mobile application, uploaded through our desktop application, or provide to us in any other way, including by e-mail. When you send an e-mail to Prosper, we may retain your e-mail address and the contents of the e-mail you send.

User Account Registration: In order for you to use parts of the Site or the Services you may have to complete a registration form and create a user account (a “**User Account**”). As part of this registration process, we require select personally identifiable information (“**Personal Identifiable Information**”) such as your name, e-mail address, address, phone number, password, age, gender, and student status. When you connect with an interview coach (a “**Coach**”), certain information will be made available to such Coach, including, but not limited to: name, e-mail address, phone number, age, gender, salary goals, industry goals, and student status (the “**Displayed Account Information**”). By visiting your User Account settings, you can correct, amend, add or delete certain personal information on our Site.

Payment Information: If you are entitled to payment by Prosper or make payment to Prosper, Prosper may require and may receive certain financial information in order to make payment to you or to receive payment from you, including, but not limited to relevant third-party payment processor account information (i.e. Stripe), direct deposit banking information, or other information required to facilitate payment to you (the “**Financial Information**”). Rest assured that Prosper will not share your Financial Information with any third-party except as required in order to facilitate such payments in accordance with your agreement with Prosper. In the event that you use a third-party payment processor in order to receive or send a payment from Prosper, including but not limited to Stripe or Apple Pay, your use of such third-party payment processor shall be governed by their then applicable terms and conditions and/or privacy policies. Stripe’s terms and conditions are available [here](#) and its privacy policy is available [here](#).

Recordings of Sessions: Your interactions with a Coach or other user on or through the Site may be recorded in audio or video format (or both) by Prosper for the purposes of quality control and training (a “**Session Recording**”). In the event that a Session Recording is created, Prosper may provide a copy of such recording to you, in its sole discretion. Except for release to you or the Coach or other user captured on such Session Recording, Prosper will not make the Session Recording public and will use it only for internal purposes related to training and quality control.

Non-Provision of Information: Please note that you can choose not to provide us with certain Personal Identifiable Information, but then you may not be able to take advantage of all of the Services or access all parts of the Site.

B. Non-Personally Identifiable Information

From time to time, we may also ask you to provide us with non-personally identifiable information, that is, data that is not intended to allow us to identify you personally, such as your first name, birthday or postal code. This information may be aggregated and used for our internal purposes or for creating reports for third-party advertisers and partners, or otherwise shared with third parties for any lawful purpose, without your permission. No third party is intended to be able to know who you are as a result of the use of this information.

We also may automatically collect Site and Service usage information, such as the numbers and frequency of users to the Site and/or Services, pages visited and similar data. This data is used in the aggregate, that is, as a statistical measure, and not in a manner that is intended to identify you personally. Aggregate information generally is collected through the use of cookies as discussed below. This aggregate information helps Prosper determine general usage patterns and modify the Site and/or Services in order to improve your experience. This type of aggregate information may be shared with third parties at any time.

In addition to our use of non-personally identifiable information as described herein, we may permit certain third-party companies to help us tailor advertising that we think may be of interest to you based on your use of the Services and to otherwise collect and use non-personally identifiable data about your use of the Site and/or Services.

C. Passive Gathering of Information Electronically

We receive and store certain types of information whenever you interact with the Site or the Services. Prosper and its authorized agents automatically receive and record certain “traffic data” on their server logs from your browser, including your IP address, cookie information, and the page you requested. Prosper uses this traffic data to help diagnose problems with its servers, analyze trends and administer the Site and the Services.

HOW WE USE INFORMATION

When you provide us with your information, we may use such information for a number of purposes, including:

- To facilitate communication between Prosper and you including, without limitation, responding to your questions or comments, sending e-mails concerning our products and services, or to contact you for feedback regarding us, our advertisers or our business partners;
- To administer your account, process payments, provide products or services to you and for Prosper marketing and promotional activities;
- To provide a report to business partners that tells them who responded to a particular offer or to facilitate the fulfilment of an order that you have made with an advertiser or business partner;
- To provide you with important functionality changes to the Site or Services, new Services and special offers from Prosper and reputable third parties that we think you will find valuable;
- To customize, analyze, adjust and improve the Site or Services to meet our or our business partners' needs and expectations;
- To enforce our agreements with you, prevent fraud and other prohibited or illegal activities, for other legally permissible purposes and generally to ensure that we comply with applicable laws; and/or

- To contact you with non-essential business communications by e-mail, if you have opted to be contacted by Prosper by e-mail.

DISCLOSURE OF INFORMATION TO THIRD PARTIES

Rest assured that we neither rent nor sell your Personal Identifiable Information to anyone and that we will share your Personal Identifiable Information only as described below.

A. Other Users

When you are connected with a Coach through the Services and/or Site, the Coach will be notified of your user account identity and will be able to view the Displayed Account Information.

B. Fulfilment of Services

We may retain other companies and individuals to perform certain functions on our behalf. Examples include, but are not limited to, companies and individuals who: (i) administer the Prosper accounts; (ii) process payments; (iii) conduct surveys or promotional activities; (iv) deliver products or services; or (v) provide customer support, web hosting, internet service, and data analysis. Such third parties may be provided with access to information needed to perform their functions but may not use such information for any other purpose.

C. Protection of Prosper and Others

We may release Personal Identifiable Information when we believe in good faith that release is necessary to comply with a law; to enforce or apply our terms of use and other policies; or to protect the rights, property, or safety of Prosper, our employees, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

D. Business Transfers

In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the business assets that are transferred. Moreover, if Prosper, or substantially all of its assets, were acquired, user information would be one of the assets transferred.

E. Prosper Personnel

Prosper personnel and authorized consultants and/or contractors may have access to Personal Identifiable Information, where such access is necessary in the normal course of Prosper business.

IMPORTANT DISCLOSURES, PRACTICES AND CONTACT INFORMATION

A. Third Party Links

We are not responsible for the practices employed by web sites linked to or from our Site or Services, nor for the information or content contained therein. Please

remember that when you use a link or go from our Site or Services to another web site, including those sites that have a link on our Site or Services, you are subject to that other web site's own rules and policies. Please read over those rules and policies before proceeding.

B. Data Security

We maintain a variety of commercially reasonable safeguards designed to protect your Personal Identifiable Information from unauthorized access and disclosure. For example, we use industry accepted tools and techniques to protect against unauthorized access to our systems.

You should be aware, however, that Prosper has no control over the security of other web sites on the Internet that you might visit, even where such other site is linked to our Site or Services. If you share your computer or use a computer that is accessed by the general public, remember to sign off and close your browser window when you have finished your session. This will help to ensure that others cannot access your information.

We want you to feel confident using the Site and Services. However, no system can be completely secure. Therefore, although we take commercially reasonable steps to secure your information, we do not promise, and you should not expect, that your information, searches or other communications always will remain secure. In the event of a breach of the confidentiality or security of your information, we will notify you if reasonably possible and as reasonably necessary so that you can take appropriate protective steps. We may notify you under such circumstances using the e-mail address(es) we have on record for you. You should also take care with how you handle and disclose your information.

C. Children

You must be the age of majority in your jurisdiction or older to register to use the Site or Services. As a result, Prosper does not intentionally collect information about children under the age of 13. If we learn that Prosper has collected information from a child under the age of 13, we will delete that information as quickly as possible. We require that minors between the ages of 13 and the age of majority in the applicable jurisdiction ask and receive a parent's or guardian's permission before using the Site and/or Services or sending information about themselves or anyone else over the Internet. If you are under the age of majority in your jurisdiction, you warrant that you have the express permission of your parent or legal guardian to use the Site and the Services and to give information about yourself to the Site. If you are a parent or legal guardian and have authorized a minor to use the Site and Services, you agree that you are responsible for the online conduct of the minor, and for the consequences of any misuse of the Site and/or Services by the minor.

D. Users from Outside Canada

This Privacy Policy is governed by the law of the Province of Ontario and the federal laws of Canada applicable therein. The Site may be hosted in Canada or in the United States. If you are visiting the Site from outside Canada or the United States, please be aware that your information may be transferred to, stored and processed in Canada or the United States, where our servers are located and our central database is operated. The data protection and other laws of Canada and the United States might not be as comprehensive as those in your country. By using the Site, you consent to your information being transferred to our facilities and to the facilities of those third parties with whom we share that information as described in this Privacy Policy.

E. No Rights of Third Parties

This Privacy Policy does not create rights enforceable by third parties.

F. Cookies

When you access or use the Site and/or Services, Prosper may use industry-wide technologies such as “cookies” and Flash (or similar technologies), which stores certain information on your computer (“**Local Storage**”) and which will allow us to enable automatic activation of certain features, and make your Site or Service experience much more convenient and effortless. The cookies used by the Site or Service are created per session, does not include any information about you, other than your session key and are removed as your session ends (usually after 24 hours). It is easy to prohibit the Local Storage. Most browsers will allow you to erase cookies from your computer’s hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. In order to erase or disable the Local Storage option in Flash you should use the settings option of Flash according to the specific instructions provided by the technology provider. However, if you block or erase cookies, or change the settings of Flash, your online experience may be limited.

We also use certain third-party cookies. These are a different kind of cookies, stored on your computer by third parties, rather than by Prosper. This kind of cookie is only read (and not altered by the Service) each time you visit the Service, and also when you visit certain websites or applications that uses similar cookies. Third-party cookies usually store only Non-personally identifiable information, such as the web pages you have visited, the duration of your browsing, etc.

G. Contacting Us

If you have any questions about Prosper generally, this Privacy Policy or the Site, please feel free to contact us by sending an email to hi@helloprosper.com