



# MeaningSphere Privacy Policy

Effective Date: [07/16/2021]

Last Updated: October 24, 2022

MeaningSphere, LLC (“**MeaningSphere**,” “**we**,” “**us**,” or “**our**”) respects your privacy. We are a networking platform that offers its users the opportunity to connect with each other regarding workplace fulfillment and other matters important to them.

This Privacy Policy (“**Privacy Policy**” or “**Policy**”) describes the types of personal data we collect from you and other people with whom we communicate and interact via our website at [www.meaningsphere.com](http://www.meaningsphere.com) and all related websites and services that enable website visitor access on our behalf (our “**Sites**”), as well as other online or offline channels, in the course of providing our workplace fulfillment services and any related or other products and services (“**Services**”). This Policy also describes how we use personal data, under what circumstances we may share it and with whom, and your rights and choices.

In some instances, this Policy may be in addition to other terms, conditions, or disclosures that apply to other programs involving our collection of personal data about you (“**Additional Terms and Policies**”). To the extent there is a conflict between this Policy and any Additional Terms and Policies, the Additional Terms and Policies will control unless they expressly state otherwise. This Policy does not apply to third-party sites, products, or services, even if they link to our Sites or Services, and we encourage you to read the privacy policies of any third-party site with which you choose to interact.

Through your continued use of our Services, you acknowledge the collection, use, and sharing of your personal data as described in this Privacy Policy. If you object to anything in this Privacy Policy, you may cease using the Services and, if applicable, terminate your account.

## Click the links below for further details

1. [Personal Data We Collect.](#) We collect personal data when you register and utilize our Services, including automatically collected data, as well as from certain third party sources.
2. [How We Use Your Personal Data.](#) We use your personal data in many ways, including to provide our Site and Services, communicate with you, maintain a safe and secure environment, and comply with legal obligations.
3. [Whom We Share Your Personal Data With.](#) We share your personal data only for our own internal purposes, to promote our Services, and according to your notice and user preferences, such as for optional research purposes with trusted research partners.
4. [Your Rights and Choices.](#) You can change various privacy and communications preferences at any time, and you may exercise privacy rights as further described below.
5. [Cookie Policy.](#) We may collect personal data from you automatically through the use of cookies and other tracking technologies.



6. [Data Security and Retention](#). We maintain appropriate technical, administrative and physical safeguards to help protect the security of your personal data.
7. [International Data Transfers](#). We may transfer personal data, including sensitive data, to the United States or other countries from which the personal data was collected for storage, processing, and use by MeaningSphere.
8. [Use by Minors](#). We do not knowingly collect personal data from individuals under the age of 18 years without parental consent.
9. [Links to Other Sites](#). This Privacy Policy does not apply to third-party sites.
10. [Updates to This Privacy Policy](#). We may update this Privacy Policy from time to time.
11. [Contact Us](#). If you would like to submit a privacy rights request as detailed above, please submit a written request by emailing us at [dataprivacy@meaningsphere.com](mailto:dataprivacy@meaningsphere.com).

## 1) Personal Data We Collect

For the purposes of this Privacy Policy, “personal data” means any information that relates to an identified or identifiable individual. Personal data does not include certain publicly available information or information that has been anonymized, de-identified, or aggregated.

### a. Personal Data You Provide Us

MeaningSphere may collect the following categories of personal data about you that you choose to provide to us when you use the Sites and Services:

- **Contact information.** You may be required or invited to provide various contact information, including your name, email address, and user name, in order to create an account with us, sign up to receive our newsletters, updates, or other communications, or to receive customer service.
- **User profile.** In order to create your user profile on the Service and maximize your user experience, you will have the opportunity throughout your experience with MeaningSphere to provide information about yourself, including your photograph, location, work history, education, experience, volunteer experience, skills and certifications, interest-based preferences, and demographic details. For example, MeaningSphere may prompt you with voluntary questions to enhance your user experience, such as our “What Matters To You?” feature or you may choose to complete surveys such as the Map of Meaning Survey. You also have the opportunity to provide basic biographic information (such as your first and last name, city, state, and country), work experience information (such as your company, role, and its location), education information (such as your school, degree, field of study, and dates of study), and volunteering information (such as your role, organization, and its location).



- **Posted content.** When you use our Service, including features such as Meaning Mirror™, Map of Meaning, Meaning Circles, Meaning Network, and Meaning Communities, you will have the opportunity to submit and/or post content for all users, certain users, or individual users. That content may include personal data provided by you.
- **Guide engagement.** Users who choose to engage with MeaningSphere as a MeaningSphere Guide (“Guide”) will be required to submit additional personal data to MeaningSphere in order for MeaningSphere to evaluate new Guides, perform quality control, help ensure that Guides are properly supported, and serve other purposes outlined in this Policy. Please note that MeaningSphere may have additional privacy notices that are applicable to Guides, which will be presented at or before the individual engages to become a Guide or otherwise accesses their Guide account.
- **Communication information.** When you respond to MeaningSphere emails, messages, or other communications, we may collect your email address, name, and any other personal data you choose to include in the content of your email or responses. In addition, when you interact with certain MeaningSphere features, such as our My Guide program, we may collect the content of those communications, including recorded messages, videos, or audio.
- **Payment information.** If you sign up for a paid product or service from us, you may be required to provide your payment card or bank account information.

## **b. Personal Data From Other Users**

MeaningSphere may collect certain personal data about you that is included in content provided by other users and Guides to MeaningSphere or via our Services, such as your professional affiliations, accomplishments, or publications, or your participation in specific Meaning Circles and Meaning Communities, in order to enhance your profile and improve the Services that we provide to you and our users.

## **c. Personal Data From Third-Party Sources**

We may collect personal data about you from third-party sources, including service providers, business partners and other third parties to help us provide and improve the Sites and Services. These third parties collect and provide this personal data to us pursuant to their privacy policies. We may supplement the information that you provide with information that we obtain from these sources, including both online and offline data providers.

## **d. Personal Data We Automatically Collect**

When you interact with our Site and Services, we may automatically collect data regarding your online behavior, including your browsing and usage history, information regarding how and when you access our Services, device and browser information, and geolocation (“Usage Data”). This data may include your



Internet Protocol (“IP”) address, device identification number, and similar identifiers. This data is collected using various technologies, including cookies, pixels, and similar tracking technologies, that may be administered by us or by third parties. Please review our [Cookie Policy](#) for more information regarding the use of these technologies.

Our Site uses Google Analytics in order to maintain and improve our web-based services. Google Analytics may automatically collect personal data about you, such as your IP address, in order to track and report website traffic. Google uses the collected data to monitor and analyze the use of our Sites and Services solely for our benefit. The third party cookies used for Google Analytics may be kept for up to two years.

If you have already consented to the Google Analytics tracker, you can choose to block or delete the Google Analytics tracker by referring to your browser’s settings and instructions. For more information on Google’s privacy practices, please visit the [Google Privacy Terms](#) web page.

Your browser or device may include “Do Not Track” functionality. At this time, the Sites do not respond to browser “Do Not Track” signals.

### **e. Anonymized and De-identified Information**

We may create anonymous or de-identified data from personal data by removing data components that make the data personally identifiable to you or through obfuscation or other means. Our use of anonymized and de-identified data, data which no longer can be used to identify you or any other particular individual, is not subject to this Privacy Policy.

## **2) How We Use Your Personal Data**

We rely on one or more legal bases to process your personal data under applicable law. We may process personal data (i) as necessary to perform our contractual obligations to you, including, but not limited to, those obligations laid out in our [Terms of Use](#) (ii) as necessary to pursue our legitimate interests; (iii) as necessary for our compliance with our legal obligation such as a request or order from courts, law enforcement or other government authorities; and/or (iv) with your consent, including to send you marketing email messages and other information that may be of interest to you.

We may collect, process, and maintain personal data to pursue the purposes outlined below, which constitute our legitimate interests. To determine these legitimate interests, we balance our legitimate interests against the legitimate interests and rights of you and others and only process personal data in accordance with those interests where they are not overridden by your data-protection interests or fundamental rights and freedoms.

- **Provide, improve, and develop the MeaningSphere Site and Services**, including to deliver your requested Services, communicate with you, provide user support, customize the Services to better fit your needs as a user, develop new Services, perform internal analytics and research and development, and for our other internal operations including troubleshooting and testing. This also includes sharing personal data with our trusted service providers that provide services on our behalf.



- **Protect you and others and to create and maintain a trusted environment**, such as to comply with our legal obligations, to ensure compliance our agreements with you and other third parties, to ensure safe, secure, and reliable Sites and Services, and to detect and prevent wrongdoing, crime, and fraud, assure compliance with our policies, and protect and defend our rights, interests, and property. In connection with the activities above, we may conduct internal research and profiling based on your interactions as a participant in various MeaningSphere programs (such as My Guide), content you submit to the Site and Services, and information obtained from third parties. In limited cases, automated processes may restrict or suspend access to the Site and Services if such processes detect activity that we think poses a safety or other risk to the Site and Services, our community, or third parties. If you challenge the decisioning based on the automated process, please email us at [dataprivacy@meaningsphere.com](mailto:dataprivacy@meaningsphere.com).
- **Provide, personalize, measure and improve our marketing**, including to send you promotional messages and other information that may be of interest to you with your consent, and administer and invite you to events sponsored or managed by MeaningSphere. We may also use personal data to understand our user base and the effectiveness of our marketing. This processing is done pursuant to our legitimate interest in undertaking marketing activities to offer products or services that may be of interest to you.

### 3) Whom We Share Your Personal Data With

MeaningSphere may share your personal data with the trusted entities described below:

- **Our service providers**, as necessary to provide services on our behalf, such as website hosting, data analysis, marketing, email delivery, technical support, and customer service.
- **Our partners** in connection with providing or promoting our Sites and Services and consistent with your notice, preferences and/or consent. This may include the optional sharing of certain of your information with our select and trusted third party research partners (“**Research Partners**”), such as where you elect to share your responses in the Map of Meaning Survey, which are pseudonymized and shared with the Research Partners identified in [Appendix A](#).
- **Other users and Guides**, consistent with your notice, preferences, and/or consent and in connection with your use of our Site and Services and interaction with various MeaningSphere features.
- **In connection with a business transaction**, subject to applicable law, in the event of a merger, acquisition, bankruptcy, or other sale or transfer of all or a portion of our assets. If any such transaction occurs, the purchaser will be entitled to use and disclose the personal data collected by us in the same manner that we are able to use it, and the purchaser will assume the rights and obligations regarding personal data as described in this Privacy Policy.



- **For compliance and harm prevention**, including to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We also may provide information in order to investigate, prevent, or take action regarding illegal activities or wrongdoing; to protect the rights, property, or safety of MeaningSphere, its users, and others; to enforce our agreements; or as otherwise required by law.

## 4) Your Rights and Choices

### a. Electronic Marketing Communications

If you would like to stop receiving a MeaningSphere newsletter via email or other electronic marketing or promotional messages, notifications, or updates, you may do so by following the unsubscribe instructions that appear in these email communications. You may also opt-out of these messages by [contacting us](#). Please be advised that you may not be able to opt-out of receiving certain service or transactional messages from us.

### b. Rights for Residents of the EEA, the UK, and Switzerland

In certain circumstances, residents of the European Economic Area (EEA), the United Kingdom (UK), and Switzerland are entitled to the following data protection rights:

- **Right to access.** You have the right to request confirmation of whether MeaningSphere processes personal data relating to you, and if so, to request a copy of that personal data.
- **Right to rectification.** You have the right to request that MeaningSphere corrects or updates your personal data that is inaccurate, incomplete or outdated.
- **Right to deletion.** You have the right to request that MeaningSphere erase your personal data in certain circumstances provided by law.
- **Right to restrict processing.** You have the right to request that MeaningSphere restrict the use of your personal data in certain circumstances.
- **Right to object to processing.** You have the right to object to MeaningSphere's processing of your personal data, under certain conditions.
- **Right to data portability.** You have the right to request that MeaningSphere export the data that we have collected to you or another company, under certain conditions.

Where the processing of your personal data is based on your previously provided consent, you have the right to withdraw your consent at any time. If you would like to exercise any of these rights, please submit a written request via the email address available [here](#).

You also have the right to lodge a complaint about our data collection and processing actions with the appropriate supervisory authority. In the UK, the appropriate authority is the Information Commissioner's



Office (ICO), accessible [here](#). In the EEA, you can view the contact information for your data protection authority [here](#).

### **c. California “Shine the Light” Law**

California residents have the right to request information regarding third parties to whom MeaningSphere has disclosed certain categories of personal data during the preceding year for the third parties’ direct marketing purposes under California’s “Shine the Light” law (Cal. Civ. Code § 1798.83). We do not currently disclose this type of personal data to third parties for their own purposes. However, if you are a California resident and would like to inquire further, please submit a written request using the contact information available [here](#). You must include in your email or mail request your full name, email address and postal address so that we can verify your California residence and respond.

### **d. Your Nevada Privacy Rights**

Nevada residents have the right to request to opt out of any sale of their personal information under Nevada SB 220. We do not currently sell personal information under Nevada law; however, you may still request to opt out of the future sale of your personal information. If you are a Nevada resident and would like to make such a request, please submit a written request via the email address available [here](#). You must include in your email or mail request your full name, email address and postal address so that we can verify your Nevada residence and respond. In the event we begin to sell personal information after the receipt of your request, we will make reasonable efforts to comply with your request as to your personal information.

## **5) Cookie Policy**

The Sites may use cookies and similar technologies to improve user experience, for performance and analytics, and to improve our content, products, and services. A “cookie” is a small text file that a web server stores in browser software. A browser sends cookies to a server when the browser makes a connection to that server (for example, when requesting a web page from the same domain that created the cookie).

The general purpose of cookies is to remember a browser over time and distinguish one browser instance (or user) from all others. Some cookies and other technologies may track the personal data users provide when they interact with a site, and may store such personal data. We use cookies for the following purposes:

- **Necessity.** To enable features that are necessary for providing you the services on our Sites, such as keeping you signed in, improving security, and preventing and detecting fraud.



- **Preference.** To allow us to remember your preferences and identify you when you return to our Sites.
- **Analytics.** To allow us to understand how our Sites are being used, track site performance and content views, and make improvements to the content, products or services.
- **Advertising.** To deliver targeted advertising based on your preferences, location, and/or interests across different services and devices and measuring effectiveness of ads.
- **Social Media.** To enable the sharing of content from our Sites through social networking and other sites.

Most browsers are initially set up to accept cookies, but you can reset your browser to block or delete all cookies in your browser's settings using the links provided below. Please note that if you block essential cookies, certain parts of the Sites may not function properly.

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Opera: <https://help.opera.com/en/latest/web-preferences/#cookies>

If you wish to opt out of our sharing of the data that is gathered when you visit our Site for purposes of targeted digital advertising, we encourage you to visit the [Network Advertising Initiative](#) or the [Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising](#) for more information about opting out of seeing targeted digital advertisements. You may also visit these websites for more information on how you can opt back in to the sharing of data. Opting out of advertising networks does not necessarily mean that you will not receive advertisements while using our Sites or on other websites.

## 6) Data Security and Retention

We maintain appropriate technical, administrative and physical safeguards to help protect the security of your personal data against unauthorized access, destruction, loss, alteration, misuse or disclosure. Your personal data is accessible to only a limited number of personnel who need access to the information to perform their duties. Please note, however, that no method of transmission over the Internet or method of electronic storage is 100% secure.

We will retain your personal data only for as long as is necessary for the purposes set out in this Privacy Policy. We retain and use personal data to the extent necessary for our legitimate business purposes, to comply with our contractual obligations and to comply with our legal obligations (for example, if we are



required to retain your data to comply with applicable laws), as well as resolve disputes, and enforce our legal agreements and policies.

## **7) International Data Transfers**

We may transfer personal data, including sensitive data, to the United States or other countries from which the personal data was collected for storage, processing, and use by MeaningSphere. Those countries may have data protection rules that are different from those of your country. We will take measures to ensure that any such transfers comply with applicable data protection laws and that your personal data remains protected to the standards described in this Privacy Policy. Personal data transferred to another country may be subject to lawful access requests by courts, law enforcement agencies, or other government authorities in those other countries.

If you are located in the EEA, the UK, or Switzerland, we comply with any applicable laws to provide an adequate level of data protection to the U.S. Where applicable law requires us to ensure that an international data transfer is governed by a data transfer mechanism, we rely on appropriate contractual, organizational, and technical safeguards, including through the use of standard contractual clauses approved by the EU and/or UK (as applicable).

## **8) Use by Minors**

You must be at least 18 years old or older to register use our Sites and the Services offered through them. No personal data should be submitted to our Sites by individuals under the age of 18. If we learn we have collected or received personal data from a child under the age of 18 without parental consent, we will delete that personal data as permitted by law. If you believe we may have any collected personal data from a child under the age of 18 without parental consent, please submit a written request via the email address available [here](#). If we become aware that we have collected personal information from children under age 13 without verification of parental consent, we will take steps to remove that information from our servers.

## **9) Links to Other Sites**

Our Sites may contain links or otherwise provide access to other third-party sites, which may include websites, mobile applications, or Internet locations. Please note that we have no control over and are not responsible for third-party sites, their content, or any products or services available through the third-party sites. Our Privacy Policy does not apply to third-party sites. We encourage you to read the privacy policies of any third-party sites with which you choose to interact.



## 10) Updates to This Privacy Policy

We may update this Privacy Policy from time to time. The date this Privacy Policy was last updated is identified at the top of this page. Any changes are effective when we post the revised Privacy Policy on the Sites. If we make material changes to this Privacy Policy that expand our rights to collect new personal data or to use differently any personal data that we have previously collected about you, we will notify you and provide you with the disclosure by posting it on our Sites and/or via email. We encourage you to review this Privacy Policy often to stay informed of how we may process your personal data.

## 11) Contact Us

If you would like to submit a privacy rights request as detailed above, please submit a written request by emailing us at [dataprivacy@meaningsphere.com](mailto:dataprivacy@meaningsphere.com). If you have any questions or concerns about this Privacy Policy or our privacy practices, please email us at [dataprivacy@meaningsphere.com](mailto:dataprivacy@meaningsphere.com) or write to us or call us using the information below:

MeaningSphere, LLC  
100 Witmer Rd., Suite 350  
Horsham, PA, 19044-2369, United States

## Appendix A – List of Current Research Partners

As further described in this Privacy Policy, MeaningSphere currently shares certain personal data with the Research Partners identified below, consistent with your optional election. MeaningSphere may add or revise its list of Current Research Partners over time, which will be immediately reflected in this list.

Name of Research Partner	Contact Information	Website
Auckland University of Technology’s (AUT) New Zealand Work Research Institute (NZWRI)	NZ Work Research Institute AUT University Private Bag 92006 Auckland 1142 New Zealand	AUT Website: <a href="https://www.aut.ac.nz/">https://www.aut.ac.nz/</a>  NZWRI Website: <a href="https://workresearch.aut.ac.nz/">https://workresearch.aut.ac.nz/</a>

*This list may be updated from time to time. Please check back for the latest updated on this page.*