

# SMMS Privacy Policy

Sprinklr is a social media management system ("SMMS"). The Sprinklr system is a tool that enables companies and organizations, or Sprinklr "Customers," to process and manage publicly available information about their brand on the Internet.

This means that the Sprinklr system aggregates and saves a record of publicly available information about your interaction with a company or organization on the Internet.

Sprinklr proactively encourages each of its Customers to engage in privacy best practices. While Sprinklr cannot guarantee that its Customers will abide by the best practices in user privacy, it does its best to ensure that everyone that is part of its ecosystem is aware of those practices and has received concrete guidance and/or training concerning implementation. Of course, Sprinklr Customers are responsible for their own use of the Sprinklr platform. Please review the Customers' individual terms of service and privacy policies for information on their privacy practices. Additionally, please review our Privacy Shield notice related to transfers of personal information from the European Union to the U.S. below.

The following are Sprinklr's promises to each Customer:

- (1) **Notice**  
When Sprinklr collects your personal information, we give you timely and appropriate notice describing what personal information we are collecting, how we will use it and the types of third parties with whom we may share it. This notice is located in this policy. Sprinklr advises its Customers to provide similar notice to their unique customers and partners of their use of the Sprinklr system.
- (2) **Choice**  
Sprinklr will give you choices about the ways we use and share your personal information, and we will respect the choices you make. Please recognize that Sprinklr is a system used by Customers and, as such, we advise and encourage our Customers to take appropriate action with respect to their own privacy standards as it relates to social media management.
- (3) **Relevance**  
Sprinklr will collect only as much personal information as is required to meet the specific, identified purposes of Customer contracts, and we will not use it for other purposes without obtaining your consent.
- (4) **Retention**  
Sprinklr will keep your personal information only as long as we need it for the purposes for which we collect it, or as permitted by law.
- (5) **Accuracy**  
Sprinklr will take appropriate steps to make sure your personal information in our records is accurate, as much as is within the power of Sprinklr as a system used by its Customers.
- (6) **Access**  
Sprinklr will provide ways for you to access your personal information as quickly as possible upon request, as required by law, so you can correct inaccuracies. Please use the address below to request access to your information.

(7) **Security**

Sprinklr will take appropriate physical, technical and organizational measures to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction. Sprinklr and its Customers enter into agreements requiring that Sprinklr use the highest industry standards with respect to storage of data and the security of its system.

(8) **Sharing**

Except as described herein, Sprinklr will not share your personal information with third parties without your consent. As standard policy, Sprinklr's Customer agreements prohibit the sharing of information beyond communication with a specific Customer.

(9) **International Transfer**

If Sprinklr is used to transfer your personal information to another country, Sprinklr will take appropriate measures to protect your privacy and the personal information transferred.

(10) **Enforcement**

Sprinklr will regularly review how we are meeting these privacy promises, and we provide an independent way to resolve complaints about our privacy practices (see immediately below).

To access your information, ask questions about our privacy practices, or issue a complaint, contact us at:

Sprinklr Privacy Compliance  
29 W. 35<sup>th</sup> St. 7<sup>th</sup> Floor  
New York, NY 10001  
(917) 933-7800  
privacy@sprinklr.com

To learn more about our Privacy Policies for the Sprinklr platform, please read below.

## Notice Concerning Content Shared Online by Children

Sprinklr does not direct any of its business practices or system outputs directly or indirectly towards children. We are committed to respecting the privacy of children online and ensuring that Sprinklr is compliant with the Children's Online Privacy Protection Act (COPPA). If Sprinklr learns that the information of a child under the age of 13 is stored within its platform, Sprinklr will promptly notify Customer representatives and delete any personal information in that user's account or any other profile information that Sprinklr has been used for.

Sprinklr's indexing of publicly available information will include information from public websites and profiles that may have in error granted accounts to children under the age of 13. Sprinklr is not accountable for the faulty verification practices deployed by third party websites or social channels.

## How the Sprinklr Platform Works

Sprinklr provides tools to allow its Customers to manage the publicly available information on Internet users primarily through social media. The use of Sprinklr by its Customers generally falls into six categories: Analytics, Audience, Engagement, Listening, Governance and Integration. The core capabilities and functionality that Sprinklr provides its customers are outlined below – greater detail and a more comprehensive list of features and functionality can be provided upon request:

**(1) Analytics features allow Customers to:**

1. Analyze and report on individual, group and overarching brand performance;
2. Associate outgoing messages with campaigns, keywords and other variables for brand analysis;
3. Rapidly build and share dashboards and reports with pre-configured widgets;
4. Compare analytics across social channels, campaigns, and persistent searches;
5. Customize reporting across various KPIs such as engagement, reach and activity;
6. Integrate reporting with external data systems; and
7. Export reporting to CSV file format.

**(2) Audience features allow Customers to:**

1. Perform multi-channel, multi-function and multi-division support for engagement, reporting and monitoring;
2. Simplify inbound content workflows with queues, message assignment for notifications and/or escalation;
3. Identify and profile audience members that require routing for notification or escalation based on influence;
4. Develop an holistic view of performance and integrate this data with a Customer's existing web analytics platforms;
5. Optimize messages to target specific audiences; and
6. Manage conversations in multiple languages.

**(3) Engagement features allow Customers to:**

1. Rely on multi-channel, multi-function and multi-division support for engagement, reporting, and monitoring across Facebook, Twitter, YouTube, LinkedIn, Google+, SlideShare, Instagram, Vkontakte, Sina Weibo, RenRen, QQ and other social channels as they emerge and are added to the Sprinklr channel portfolio;
2. Identify and profile audience members that require routing for notification or escalation based on influence, sentiment, tone, past engagement and other custom variables;
3. Create customized approval workflows based on user permissions;
4. Simplify inbound content workflow with queues, message assignment and notifications;

5. Identify and profile brand advocates and key influencers;
6. Filter messages to identify and delete spam, and the “spammers” propagating undesirable conversations and content, using our proprietary “Spam Index”;
7. Determine most active members via our “Participation Index”;
8. Search, filter and analyze audience members and create rules to automatically tag, segment, and profile them; and
9. Determine sentiment via automated and manual scoring through our Natural Language Processing system.

**(4) Listening features allow Customers to:**

1. Perform keyword searches and search senders across social media platforms, blogs & blog comments, mainstream news sources, forums, photo and video sites, social network communities and broad searches;
2. View the volume of conversation whenever users interact with the brand;
3. View visual analytic displays of conversation trends over a specified time range;
4. Search, filter and analyze conversation streams to determine sentiment, intent, mood and market trends; and
5. Export reporting to CSV, PDF and/or Excel file format.

**(5) Governance features allow Customers to:**

1. Manage access at the division, social account, and user role levels;
2. Track interaction and activity enterprise-wide;
3. Assign message approvers and change permissions and passwords;
4. Configure multi-user, group or individual routing, queues, notifications and escalation procedures;
5. Define automated, customizable and flexible rules, filters, actions and alerts.
6. Standardize reporting metrics;
7. Maintain a global content schedule and calendar via the Sprinklr Planner;
8. Create templates for Social apps with object “lock down” in the Social App Suite;
9. Centralize digital asset inventory and management; and
10. Establish automated and manual workflow options.

**(6) Integration features allow Customers to:**

1. Shorten URLs via bit.ly or your own domain URL;
2. Implement domain white-labeling;
3. Build and deploy custom widgets for your corporate intranet;
4. Integrate with web analytics tools for holistic measurement;
5. Connect with CRM systems; and
6. Employ the Social Bar as an interstitial that frames posted links with customized content.

Sprinklr Customers use the platform to perform functions with the system as outlined above.

### The Content the Sprinklr Platform Allows Customers to Index

Sprinklr is a social media management system that lets companies manage and measure social media content. A monitoring dashboard enables users to track keywords, influencers and competitors. Dashboards can be shared across the organization to improve operational efficiency. The intent of Sprinklr is that the information that Sprinklr is indexing can be found by anyone online using a search engine.

Sprinklr's Customers use the Sprinklr system to aggregate publicly available content on the Internet. This includes, but is not limited to:

- Twitter
- Facebook
- YouTube
- LinkedIn
- Google+
- SlideShare
- Instagram
- Vkontakte
- Sina Weibo
- RenRen
- QQ
- Blogs & blog comments
- Mainstream news sources and
- Forums

Sprinklr does not circumvent any of your personal privacy settings on any of the platforms that it indexes content from. The Sprinklr system is intended for the use of publicly available information. Sprinklr does not bear

responsibility for its Customers use of the platform. Sprinklr has implemented security practices to account for this use of the platform as a safeguard.

## How Sprinklr Uses Your Content

Sprinklr is a social media management system deployed and used primarily by its Customers. As such, Sprinklr's Customers are the ones who are indexing content using the Sprinklr tool. Sprinklr requires each one of its customers to sign agreements with Sprinklr that align with Sprinklr's privacy practices. We also require, as part of the customer agreements, that Sprinklr Customers agree to abide by the policies of third-party websites, such as Facebook and Twitter, as well as comply with all applicable laws and regulations, including, but not limited to, privacy laws and regulations.

Sprinklr works arduously to ensure that it is in compliance with the laws of all international jurisdictions in which its Customers may use the platform.

## Communication

The Sprinklr system allows its Customers to communicate with Internet users who post content publicly on social networking services and other sites. Sprinklr customers agree to abide by the policies of third-party websites, such as Facebook and Twitter, as well as comply with all applicable laws and regulations, including, but not limited to, privacy laws and regulations.

Sprinklr works arduously to ensure that it is in compliance with the laws of all international jurisdictions in which its Customers may use the platform.

Any private communications between Sprinklr Customers and Internet users through the Sprinklr platform are maintained in accordance with the terms of the customer agreements.

## Monitoring

The Sprinklr platform allows Customers to monitor Internet users who interact with the Customer through publicly available content.

For example, if an Internet user Tweets about the fictitious brand "Joe's Shoes" and their Tweets are set to "public" in their Twitter privacy settings, Joe's Shoes would have the ability, by using the Sprinklr system, to track this Internet user to determine if these actions and sentiments lead the Internet user to become a customer, make a purchase or in some other ways interact with the Joe's Shoes brand.

As part of the customer agreements Sprinklr Customers agree to abide by the policies of third-party websites, such as Facebook and Twitter, as well as comply with all applicable laws and regulations, including, but not limited to, privacy laws and regulations.

## Targeting

The Sprinklr platform also allows its customers to post advertisements and campaigns. As part of the customer agreements Sprinklr Customers agree to abide by the advertising policies of third-party websites, such as Facebook and Twitter, as well as comply with all applicable laws and regulations relating to such advertising.

## Accessing Your Information Stored on the Sprinklr Platform

You have the right, upon written request, to access the publicly available information that Sprinklr processes. If such content is found, Sprinklr will inform you about such content (limited by others' privacy interests or legal rights), how

it is being used and other information as required under applicable law. This obligation is only in relation to content that is directly held by Sprinklr, not in any information that is held by its Customers and not Sprinklr.

To make a request, please send a letter or an email to Sprinklr Privacy Compliance. Please include the following information in your request:

- 1) Your Name;
- 2) Your Contact Information, including phone number, address and email; and
- 3) The Precise nature of your request.

Such requests can be sent to [privacy@sprinklr.com](mailto:privacy@sprinklr.com) or be mailed to:

Sprinklr Privacy Compliance  
29 W. 35<sup>th</sup> St. 7<sup>th</sup> Floor  
New York, NY 10001  
(917) 933-7800  
[privacy@sprinklr.com](mailto:privacy@sprinklr.com)

### Sprinklr's Mobile Application for Customer Use

Sprinklr's mobile application (offered for Android, iOS and Windows Mobile) is available for download and use in the iTunes Store, Google Play Store, Microsoft Store and Windows Phone Store. Sprinklr's applications are only for use by Customers of Sprinklr. If you are not a Customer of Sprinklr, you should un-install the application from your device immediately.

If you are a Customer of Sprinklr, you agree to the contents of this Privacy Policy, Sprinklr's Terms of Use and any other terms and conditions set forth in the agreements that your company has with Sprinklr.

# Sprinklr's Policy for Data Transfer from the European Union to the U.S.

## Sprinklr and Participation in E.U.-U.S. Privacy Shield

Some of our Customers' use of the Sprinklr system may require a cross-border transfer of personal information. Sprinklr has self-certified its compliance with the E.U.-US Privacy Shield Framework, as set forth by the US Department of Commerce, regarding the collection, use, and retention of personal information from European Union (EU) member countries. Sprinklr adheres to the Privacy Shield principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability. If there is any conflict between the statements in this policy and the Privacy Shield principles, the Privacy Shield principles shall govern. By choosing to participate in the Privacy Shield, we have agreed to abide by the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC) or any other U.S. authorized statutory body.

To learn more about the Privacy Shield program and to view our certification, please visit <https://www.privacyshield.gov/>.

## Definitions

"Personal Information" or "Information" means any information or set of information that (1) is transferred from the EU to the United States; (2) is recorded in any form or medium; (3) is about, or pertains to a specific individual; and (4) that identifies, or can be used to identify, a specific individual.

"Sensitive Personal Information" means Personal Information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information that concerns health or sex life. In this privacy policy, all references to Personal Information include Sensitive Personal Information.

## Principles

### Notice

Sprinklr shall inform an individual of the purpose for which it collects and uses the Personal Information and the types of third parties to which Sprinklr discloses or may disclose that Information. Sprinklr shall provide the individual with the choice and means for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to Sprinklr, or as soon as practicable thereafter, and in any event before Sprinklr uses or discloses the Information for a purpose other than for which it was originally collected. Such notice may be disseminated, for example, through the provision of this Privacy Policy.

Sprinklr functions as a data processor on behalf of its Customers by providing its Customers with a social media management software platform. The types of Personal Information that Sprinklr may collect in order to provide services to our Customers include, but are not limited to: (1) the first and last names, contact details, and Sprinklr platform information, such as the user IDs, first and last names, and usage activity of Customers' employees, (2) social network user IDs, social network names, social network communications, any associated social networking information, and any other kind of information provided by Customers, which are processed by Sprinklr's Customers; and (3) first and last names and contact details of our prospective Customers.

We collect Personal Information for various purposes, which include, but are not limited to: (1) providing our Customers with our social media management services; (2) marketing our products and services to prospective Customers; and (3) marketing new products and services to our existing Customers.

### Choice

When required by the Privacy Shield, Sprinklr will offer individuals the opportunity to choose (opt out) of whether their Personal Information is (1) to be disclosed to a third party, or (2) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

We will comply with the Privacy Shield Principles with respect to disclosures of Sensitive Personal Information, including, when applicable, obtaining the explicit consent (i.e., opt in consent) of the individual prior to disclosing sensitive information to a third party or using Sensitive Personal Information for purposes other than those for which it was originally collected or subsequently authorized by the individual. Sprinklr shall treat Sensitive Personal Information received from an individual the same as the individual would treat and identify it as Sensitive Personal Information. Please contact Sprinklr Privacy Compliance for further details.

### Accountability for Onward Transfers to Third Parties

Sprinklr is potentially liable in cases of onward transfers of Personal Information to third parties. Prior to disclosing Personal Information to a third party, Sprinklr shall notify the individual of such disclosure and allow the individual the choice (opt out) of such disclosure. As stated above, prior to disclosing Sensitive Personal Information to a third party, Sprinklr, in most instances, will obtain the individual's affirmative express (opt in) consent. Sprinklr shall ensure that any third party to which Personal Information may be disclosed subscribes to the Principles or are subject to law and/or agreements providing the same level of privacy protection as is required by the Principles, and agree in writing to provide an adequate level of privacy protection. All changes and notifications will be available at <https://www.sprinklr.com/privacy>.

We may transfer Personal Information to third-party agents, or service providers, who perform functions on our behalf, such as cloud-based services and customer relationship management providers, that we use to provide our Customers with social media management services and market our products and services. We enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection the Privacy Shield requires and limiting their use of the data to the specified services provided on our behalf.

At this time, we do not transfer Personal Information to unaffiliated third parties acting as data controllers. If we choose to begin transferring your Personal Information to such third parties, we will notify you by updating this Privacy Policy and comply with the applicable Privacy Shield Principles with respect to disclosures to such third parties.

In some rare cases, it may be necessary to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

### Data Security

Sprinklr shall take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Sprinklr has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. The completion of the SOC 1 and 2 Type 2 Certification typifies Sprinklr's continued commitment to create and maintain the most stringent controls needed to ensure the highest quality and security of services provided to its Customers. Sprinklr cannot guarantee the security of Information on or transmitted via the Internet.

## Data Integrity

Sprinklr shall only process Personal Information in a way that is compatible with and relevant to the purposes for which it was collected or authorized by the individual. To the extent necessary for this purpose, Sprinklr shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

## Access

An individual has the right to obtain Sprinklr's confirmation as to whether we maintain Personal Information relating to you. Upon request, Sprinklr shall allow an individual access to his or her Personal Information and allow the individual to correct, amend or delete inaccurate information. An individual's right to access Personal Information may be restricted in exceptional circumstances, including, but not limited to, when the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual may be violated. If Sprinklr determines that an individual's access should be restricted in a particular instance, Sprinklr will provide the individual with an explanation of the determination and respond to any inquiries the individual may have.

To request to access, correct, or amend Personal Information, an individual may contact Sprinklr's Privacy Compliance at the contact information provided below.

## Recourse, Enforcement, and Liability

Sprinklr uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Privacy Shield Principles.

We encourage interested persons to raise any concerns or complaints using the contact information provided below, and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with these Principles.

If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the European data protection authorities (EU DPAs) as an independent recourse mechanism. Sprinklr will cooperate with the DPAs in the investigation and resolution of complaints brought by you under the Privacy Shield. Sprinklr agrees to comply with any advice given by the DPAs where the DPAs take the view that the organization needs to take specific action to comply with the Privacy Shield Principles. Under certain conditions, it is possible for individuals to invoke binding arbitration before the Privacy Shield Panel.

## Amendments

This Privacy Policy may be amended from time to time consistent with the requirements of the laws of the European Union. Sprinklr will provide notification of such changes through the Sprinklr website.

## Contact Information for Sprinklr's Privacy Compliance

To request to access, modify, or delete Personal Information, inquire about this Privacy Policy, or file a privacy complaint, please send a letter or an email to Sprinklr Privacy Compliance. Please include the following information in your request:

- 1) Your Name;
- 2) Your contact information, including phone number, mailing address, and email address; and

3) The precise nature of your request, inquiry, or complaint.

Such requests, inquiries, or complaints can be sent to [privacy@sprinklr.com](mailto:privacy@sprinklr.com) or be mailed to:

Sprinklr Privacy Compliance  
29 W. 35<sup>th</sup> St. 7<sup>th</sup> Floor  
New York, NY 10001  
[privacy@sprinklr.com](mailto:privacy@sprinklr.com)

Individuals may also contact Sprinklr Privacy Compliance by telephone at (917) 933-7800.

### **General Amendments and Updates to this Sprinklr Social Media Management System Privacy Policy**

This SMMS Privacy Policy may be amended from time to time consistent with applicable laws. Sprinklr will provide notification of changes to this SMMS Privacy Policy through the Sprinklr website.