

Privacy Policy

Last updated: September 17, 2021

Double Blinde, LLC cares about Your privacy and the security of Your Personal Information.

This Privacy Policy describes Double Blinde, LLC's privacy practices in connection with Our print and digital products and services, including Our public-facing website (intelligencecommunitynews.com), newsletters and other content We provide, and any other site or service that posts or links to this Privacy Policy. It describes the kinds of information We may gather in connection with the Services, how We use Your information, to whom We disclose Your information, and how You can manage Your information.

By using Our Services, You are accepting the practices described in Our Privacy Policy, including Our use of cookies and similar online tools. If You do not agree to the terms of this Privacy Policy, please do not use Our Services. We reserve the right to modify or amend the terms of Our privacy policy from time to time without notice. Any changes to this Privacy Policy will become effective as of the "last updated" date set forth above. Your continued use of Our Services following the posting of changes to these terms will mean You accept those changes.

1. Interpretation and Definitions

1.1 Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

1.2 Definitions

For the purposes of this Privacy Policy:

- **"Account"** means a unique account created for You to access Our Service or parts of Our Service.
- **"Client"** refers to any individual or company who has purchased a Service from Double Blinde, LLC, including Subscribers and purchasers of Sponsored Content.
- **"Company"** (referred to as either "the Company", "**We**", "**Us**" or "**Our**" in this Agreement) refers to Double Blinde, LLC, 302 East Street NE, Vienna, VA 22180.
- **"Content"** any text, graphics, images, audio, video, software, data compilations, page layout, underlying code and software and any other form of information capable of being stored in a computer that appears on or forms part of the Website and/or Services.
- **"Cookies"** are small files that are placed in Your Device's browser by a website. Cookies contain the details of Your browsing history on that website, and, among its

many uses, make it possible to recognize You as the same User across one or more browsing sessions.

- **“Device”** means any device, such as a computer, a cellphone, or a tablet used to access digital Services.
- **“Free Content”** and/or **“ICN Newsletter”** is content offered by Double Blinde, LLC free of charge in consideration for agreeing to Our terms and conditions and signing up for a free e-newsletter via the Website.
- **“Personal Information”** is any information that relates to an identified or identifiable individual and may be voluntarily provided information, information collected automatically (such as usage data), or both.
- **“Service”** refers to any product or service provided by Double Blinde, LLC including but not limited to any access to and/or services listed on the Website, and Sponsored Content.
- **“Service Provider”** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **“Sponsored Content”** is content produced by a Client or by Double Blinde, LLC on behalf of a Client which is posted and hosted as a special feature in the “IC Insider” section of the Website.
- **“Subscriber”** means the individual or company that purchases an annual subscription to the Intelligence Community News Website and/or Double Blinde, LLC content.
- **“Subscription”** means annually paid access to content on the Website by any User(s) by means of their Subscriber Account.
- **“Usage Data”** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **“User Submissions”** refers to any content placed on the Website, including images, text, video, comments, letters to the editor, emails and other data, by Users unaffiliated with Double Blinde, LLC. User Submissions may be approved prior to posting by Double Blinde, LLC, such as Sponsored Content, or may be posted on the Website without prior Double Blinde, LLC approval (e.g., User comments).
- **“Website”** means the Intelligence Community News website owned by Double Blinde, LLC with the url: <http://www.intelligencecommunitynews.com> and any sub-domains of this site, unless expressly excluded by their own terms and conditions.
- **“You”** (also referred to as **“User”**) means any and all individuals accessing or using the Service, or any company or other legal entity on behalf of which any individual is accessing or using the Service, as applicable.

2. Collecting Your Personal Information

2.1 Provided / Volunteered Data

While You are using Our Services, You may voluntarily provide several different types of Personal Information. There are several circumstances under which You supply us with information, which may include, but is not limited to:

- Contact information, including Your personal and/or business contact information, such as Your name, e-mail address, street address, and phone number.
- Profile/Account information, such as Your username and password that You may set to establish an Account with us.
- Registration information, such as information You provide when You register and/or Subscribe for any of Our Services or when You register for events.
- Marketing data, such as information related to Your preferences for receiving communications, subscribing to Our publications, newsletters and other Content.
- Communications, such as information You provide when you send Us an email, submit Content, request information, or otherwise correspond with Us.
- Other information that We may collect which is not specifically listed here, but which We will use in accordance with this Privacy Policy.

2.2 Automatically Collected/Usage Data

While You are using Our Services, We and Our Service Providers may automatically collect/log Personal Information occurring related to Our Services and on or through Our Website, which may include, but is not limited to:

- Device information: We may collect information such as Your Device's Internet Protocol (IP) address, mobile Device unique ID, browser type, browser version, operating system, the pages of Our Website that You visit, the time and date of Your visit, the time spent on those pages, other unique device identifiers, and other diagnostic data.
- Usage information/data: We may collect information about the Services You use; the time, date, and duration of Your use of the Services; Your interaction with content offered through the Services; site engagement; browsing and search history; search terms used; referring websites; and software crash reports. Our servers may automatically keep an activity log of Your use of the Services. Usage information may be collected at the individual or aggregate level.
- Location information: We may collect and store Your Device's IP address, which may disclose the general location of Your Device at the time You accessed Our Services.
- Information from Third Parties: We may receive information about You from third parties, including Our Service Providers, and We may combine this information with information We receive from or about You. For example, We may receive information from social media websites (such as LinkedIn), based on Your interaction with Our Services on those platforms, and We may collect the personal information available from that page or platform or that You make available to us on that page or account. We may also collect

certain information about You provided to us by third parties, including Our Service Providers

3. Tracking Technologies

We and Our Service Providers (which provide functionality, measurements, or analytics for Our Services) may use cookies, web beacons, and other similar technologies to track Your use of Our Services.

3.1 Cookies

We and Our Service Providers use cookies for a variety of purposes, including remembering Your sign-in credentials and preferences so that You do not have to input them each time You use the Services; allowing us and third parties to customize Your experience using the Services; and allowing us and third parties to monitor site traffic and performance, so that We may improve Our Services and Your experience. Cookies can be “persistent” cookies, which remain on Your Device when You go offline, or “session” cookies, which are deleted as soon as You close Your web browser.

3.2 Web Beacons

We and Our Service Providers may use web beacons (also referred to as “web tags,” “clear gifs,” “pixel tags,” “single-pixel gifs,” or “pixels,” which are tiny graphics or scripts that communicate information from Your Device to a server. These web beacons allow Us and/or Our Service Providers to read specific types of information (e.g. when You viewed the beacon, the IP address of the device on which you viewed the beacon) and to use this information for a variety of purposes including, but not limited to, counting Users who have visited Our Website or opened the ICN Newsletter, and for other related website statistics used to analyze the engagement with and improve Our Services.

4. Using Your Personal Information

We may use collected Personal Information for the following purposes:

- **To provide and maintain Our Services:** We may use Your information to process Your subscription, send You electronic newsletters, enable Your participation in Our Services, and to monitor the use of and improve Our Services. This may include use of Your information to help Us better understand Your use of, and Our delivery of, Our Services, including content selection, delivery methods, and reporting, as well as use of Your information to identify and repair errors that impair intended Service functionality. We may also create aggregated, de-identified or other anonymous data records (excluding information, such as a name, that makes the data identifiable as You) from the information We collect from Our Users to use and share with Our Services Providers for Our lawful business purposes, including to analyze and improve Our Services and promote Our business.
- **To provide customer support:** We may use Your information in order to provide customer support and to manage Your Account that gives You access to Our Services.
- **To contact and communicate with You:** We may use Your information to contact or communicate with You (by email, phone, or other means) concerning: editorial newsletters and content; invitations to events; offers, updates or announcements about

Our Services; communications about Your comments or information submissions; online surveys; and legal notices, policy updates, and other important information about Our Services.

- **To facilitate social media engagement:** We may use Your information, including information provided to us by social media platforms, to enable You to interact with Our Services on a social media platform (e.g., accessing Our Services through a posting on LinkedIn). We may also use Your information to help us determine which content Our Services should deliver on those social media platforms.
- **To conduct business transfers:** We may use Your information 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 Service Users is among the assets transferred.
- **To facilitate information security:** We may use Your information to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and to facilitate the prosecution of those responsible for that activity.
- **To protect Our rights, others' rights and safety, and to prevent fraud:** We may use Your information as necessary to detect, investigate, and prevent activities that may violate Our policies or may be fraudulent or illegal; to protect, enforce, or defend the legal rights, privacy, safety, or property of the Company, its employees, agents, or Users. We may also use Your personal information to ensure compliance with this Privacy Policy, with the Terms and Conditions that govern the use of Our Website and Services, and any other terms of use to which You may agree in the course of using Our Services.
- **To comply with the law:** We may use Your information as required by law or if We in good faith believe that such action is necessary to comply with the law or legal process.

5. Sharing or disclosing Your Personal Information

We may share or disclose Your Personal Information in the following situations:

- **With Our Service Providers:** We use third-party Service Providers to perform functions on Our behalf, including, but not limited to, hosting, content management tools, social media integration, analytics, and billing. These Service Providers may have access to Personal Information if needed to perform their functions. If such access is required, the Service Providers are obligated to maintain the confidentiality and security of that information, and they are restricted from using, selling, distributing, or altering the information in any way other than to provide the requested services to the Company.
- **With third-party content partners:** When You use Our Services, third parties that provide content to Our Services (e.g., Sponsored Content) may collect or receive information about You and/or Your use of the Services, including through the use of cookies, beacons, and similar technologies. These third parties' use of Your information will be based on their own privacy policies.

- **With social media services:** If You access Our Services through a social media service, We may share information about You or Your activities on that social media service, including what You view on Our Website, with that social media service and/or its users. Social media services may use that information based on their own privacy policies. If You do not want Your information shared in this way, do not access Our Services through a social media service.
- **For business transfers:** We may share or transfer Your information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company, or in the event of an insolvency, bankruptcy, or receivership.
- **With affiliates:** We may share Your information with Our affiliates for purposes consistent with this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **For law enforcement, legal process, and emergency situations:** In some cases, We may disclose Your information to a third party if We are required to do so by law or if We in good faith believe that such action is necessary to comply with the law or legal process; to protect and defend Our rights or to prevent misuse of Our Services or fraud; or to protect the personal safety of Our employees, agents, partners, the Users of Our Services, or the public.
- **With professional advisors:** We may share Your information with professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to Us.
- **With other Users:** If You elect to provide information or otherwise interact with other users in the public areas available through Our Services (e.g., posting comments on articles on Our Website), such information may be viewed by all Users and may be publicly distributed.
- **With Your consent:** We may share Your information with third parties for any other purpose whenever You consent to or direct such sharing.

6. Retaining Your Personal Information

We will retain Your Personal Information only for as long as is necessary for the purposes for which the data was collected or for which it is to be further processed. We will also retain and use Your Personal Information to the extent necessary to comply with Our legal obligations (for example, if We are required to retain Your data to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies.

7. Transferring Your Personal Information

Your information, including Personal Information, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Information will take place to an organization or a country unless there are adequate controls in place, including the security of Your information.

8. Securing Your Personal Information

The security of Your Personal Information is important to Us. However, while We strive to use commercially acceptable means to protect Your Personal Information, We cannot guarantee its absolute security because no method of transmission over the Internet or method of electronic storage is 100% secure. Furthermore, You need to help protect the privacy of Your information. You must take precautions to protect the security of any Personal Information that You may transmit over any home networks, wireless routers, wireless (WiFi) networks or similar devices by using encryption or other techniques to prevent unauthorized persons from intercepting or receiving any of Your Personal Information. You are responsible for the security of Your information when using unencrypted, open access or otherwise unsecured networks.

9. California User Information

This section applies only to California residents. It describes how We collect, use and share Personal Information of California residents in operating Our business, and their rights with respect to that Personal Information. For purposes of this section, "Personal Information" has the meaning given in the California Consumer Privacy Act of 2018 ("CCPA") but does not include information exempted from the scope of the CCPA.

We collect the following statutory categories (as defined by CCPA) of Personal Information:

- Identifiers (e.g., name, email address, mailing address, phone number) and online identifiers (e.g., account login, cookies, beacons, other unique online identifiers).
- Commercial information (e.g., subscription records, site engagement).
- Internet or network information (e.g., browsing and search history, site and advertisement interactions).
- Protected classification characteristics (e.g., age or gender; please note that We do not intentionally collect this information, but it may be revealed in identifier data or other information We collect)
- Inferences (e.g., information about Your interests, preferences, and favorites).

The sources from which We collect information are described in Section 2 and Section 3 of this Privacy Policy; the business and commercial purposes for which We collect this information are described in Section 4 of this Privacy Policy; and the categories of third parties to whom We share or disclose the information for a business purpose are described in Section 5 of this Privacy Policy.

9.1 CA resident rights

As a California resident, You have the rights listed below. However, these rights are not absolute, and in certain cases We may decline Your request as permitted by law.

- You can request the following information about how We have collected and used Your Personal Information during the past 12 months:
 - The categories of Personal Information that We have collected.
 - The categories of sources from which We collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with whom We share Personal Information.
 - Whether We have disclosed Your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third-party recipient.
 - Whether We've sold Your Personal Information, and if so, the categories of Personal Information received by each category of third-party recipient. However, please note that We do not currently sell any of Our Users' Personal Information.
- You can request a copy of the Personal Information that We have collected about You during the past 12 months.
- You can ask Us to delete the Personal Information that We have collected from You.
- Although the CCPA offers California residents the right to opt out of having their Personal Information sold, We do not sell individuals' Personal Information, and We do not use services that help deliver interest-based ads to You. Our Services are ad free. We do not make Personal Information We have collected available to any business partners for their use for the purpose of advertising activity that might be considered a "sale" of Your Personal Information. Consequently, We have no uses of Your Personal Information that might be considered a "sale" from which You could opt out.
- You can exercise the rights described above free from discrimination. This means We will not penalize You for exercising Your rights.

9.2 Exercising Your rights

To request to exercise any of the rights listed above, please email: editor@intelligencecommunitynews.com.

Please note that We reserve the right to confirm Your California residence to process Your request(s), and We will need to confirm Your identity to process Your request(s). As part of this process, government identification may be required. California residents can empower an "authorized agent" to submit requests on their behalf. We will require the authorized agent to have a written authorization confirming that authority. We cannot process Your request if You do not provide Us with sufficient detail to allow Us to understand and respond to it.

10. EEA and Switzerland User Information

This section applies only residents of the EEA or Switzerland. The following information applies with respect to Personal Information collected through Your use of Our Services.

We process Personal Information consistent with Our disclosures in this Privacy Policy. We process Personal Information on the following legal bases: (1) with Your consent; (2) as necessary to perform Our agreement to provide Services (such as when You sign up for Our newsletter or subscribe to Our Website); and (3) as necessary for Our legitimate interests in

providing the Services where those interests do not override Your fundamental rights and freedoms related to data privacy.

Double Blinde, LLC's Services do not process Personal Information for the purposes of ad targeting, selection, and delivery (either within or outside the Services).

As noted in Section 7, Personal Information We collect may be transferred to, and stored and processed in, the United States or any other country in which We or Our affiliates or processors maintain facilities. We will ensure that transfers of Personal Information to a third country or an international organization are subject to appropriate safeguards.

You are entitled to the rights under Chapter III of the EU General Data Protection Regulation or Section 2 of the Swiss Federal Act on Data Protection with respect to the processing of Your Personal Information, which include the right to access and rectify and to request erasure of Personal Information. To exercise these rights, please contact editor@intelligencecommunitynews.com and provide as complete a description of Your request as possible. Please note that if You withdraw Your consent to the use or sharing of Your Personal Information for the purposes set out in this Privacy Policy, We may not be able to provide You with all (or any) of Our Services.

11. Children's Privacy

Our Services are not intended for children under 16 years of age. We do not knowingly collect Personal Information from anyone under the age of 16, and We do not target Our Services to children under the age of 16. If You are under 16 years of age, do not provide Personal Information to Us without providing Us with consent from Your parents. If We discover that We have collected Personal Information from anyone under the age of 16 without verification of parental consent, We will delete that information from as soon as reasonably practicable. If You believe that We have been provided the Personal Information of a child under the age of 16 without parental consent, please notify us immediately at editor@intelligencecommunitynews.com

12. Links to Other Websites

Our Services may contain links to other websites, mobile applications, and other online services operated by third parties; other websites, mobile applications, and online services operated by third parties may contain links to Our Services. These links are not an endorsement of, or representation that We are affiliated with, any third party. Additionally, Our content may be included on web pages or in mobile applications or online services that are not associated with Us. We do not control third party websites, mobile applications or online services, and We are not responsible for their actions or their privacy policies. Other websites, mobile applications and Services follow different rules regarding the collection, use and sharing of Your Personal Information. We encourage You to read the privacy policies of the other websites, mobile applications and online services You use.

13. Other Important Information

You may always opt-out of receiving future newsletters or email marketing from Double Blinde, LLC by following the instructions contained newsletters, or by emailing us at the address in Section 15 of the Privacy Policy below.

14. Changes to this Privacy Policy

We may update Our Privacy Policy occasionally. We will notify You of any changes by posting the new Privacy Policy on Our Website, as well as a prominent notice on Our Website, and We will update the “Last updated” date at the top of the policy. We recommend that You review this Privacy Policy periodically for any changes. Changes to the Privacy Policy are effective when they are posted on the Website.

15. Contact Us

If You have any questions about this Privacy Policy, You can contact us by email: editor@intelligencecommunitynews.com