



PRIVACY POLICY

Last updated: February 10, 2015

The Usher Mobile Identity Service collects personally identifiable information from you solely to operate the Service as described in the "How We Use Your User Information" section below. We will not sell your personally identifiable information to advertisers or spammers. We will only share the information we collect from you as described in the section below entitled "How We Share Your User Information."

We at **Usher Incorporated** ("we" or the "Company"), a subsidiary of MicroStrategy Incorporated, respect your privacy and value the relationship we have with you. This Privacy Policy is designed to inform you regarding the information about you we collect when you use the Usher Identity mobile software application (the "Usher ID App") and the Usher Mobile mobile software application (the "Usher Mobile App" and together with the Usher ID App, the "Applications") and the related website (the "Site" and together with the Applications, the "Service"), and how we use and share that information.

Information We Collect About You

The Service is a tool that enables you and other individuals who install the Usher ID App or other variants of the Usher ID App that we may make available from time to time ("Users") to (i) aggregate your professional and social credentials in a single location; (ii) use the Site to create an "Usher Network"; (iii) send badges for such Usher Network ("Usher Badges") to members of your professional and social organizations ("Organizations"); (iv) allow other Users within a shared Usher Network to confirm your credentials for such Usher Network by using the Usher ID App, including by scanning the QR code then associated with your User account or by inputting into the Usher ID App the characters of the "Usher Code" then associated with your User account; (v) use the "Usher Keys" feature to gain secure physical or logical access to locations or items associated with an Usher Badge, such as computer workstations and websites or servers; (vi) discover other Users in your Usher Network when such Users are in close proximity to your current location ("Peer Discovery"); and (vii) allow such other Users to use the Peer Discovery feature to discover you. In order to facilitate these processes, the Service may collect your personally identifiable information in various ways, including: (i) by collecting certain information about you when you create a new Usher Network, when you are invited to join an Usher Network or when you accept an Usher Badge for an Usher Network you are invited to join ("Usher Account Information"); (ii) at the option of the Administrator of an Usher Network, by connecting an Usher Network to your Organization's existing account with certain third-party sites, such as WordPress.org, Plus.Google.com or Salesforce.com ("Third Party Sites"); (iii) by collecting your Location Data (as defined below); (iv) by recording when and where you use certain features of the Service, such as the Usher Keys feature; and (v) in other ways as described by this Privacy Policy.

Usher Account Information

As a User, if you choose to create a new Usher Network using the Site, you will be the administrator for such Usher Network ("Administrator"). If you choose to establish a new Usher Network as an Administrator or if you are invited via email by an Administrator to join a new Usher Network, the Usher Account Information that we will collect may include, without limitation:

- your name
- your organization
- your title
- your email address

- your phone number
- your photo

Third Party Site Information

If you are an Administrator of an Usher Network, at your option, you may integrate the Usher Badges for such Usher Network with an existing Third Party Site account, thereby enabling you and other Users in your Usher Network to log into such Third Party Site using such Usher Badge. As an Administrator, if you choose to integrate your Usher Network with a Third Party Site, you may be asked to provide certain personal information, including your name, the specific URL associated with your Organization's Third Party Site account, and your username or email address associated with such Third Party Site (collectively hereinafter referred to as "Third Party Site Information").

As an Administrator, if you choose to integrate your Usher Network with a Third Party Site, you may use your Organization's existing address book, directory or other list of contacts located on such Third Party Site to invite other members of your Organization to join your Usher Network, thereby allowing such other members of your Organization to log into such Third Party Site using the applicable Usher Badge.

If an Administrator uses a Third Party Site to send you an Usher Badge, thereby inviting you to join an Usher Network, in addition to your Usher Account Information, we may collect your username for such Third Party Site.

Your use of Third Party Sites in general and your relationship with such Third Party Sites are subject to such Third Party Sites' own privacy policies and other terms and policies, which we strongly recommend that you review before you start using the Service or integrate any of your Usher Badges with such Third Party Sites. We do not control and are not responsible for the processing of your information by Third Party Sites.

Usage Information

In addition to the Usher Account Information and Third Party Site Information, we may automatically collect information about you based upon your use of the Service, including your Location Data (as defined below), when and where you use the Usher Keys feature, when and where you use the Service to unlock doors or log into your computer, Third Party Site or other system, your requests for customer support, your user feedback and other communications you direct to us, how often you log into the Service and what functions of the Service you use the most frequently (collectively the "Usage Information").

Login Information

We may also collect your login information for the websites or servers of participating Organizations, which we will use to verify your credentials for each applicable Organization. As referenced above, if your Usher Badge is integrated with a Third Party Site, we may also collect your username from such Third Party Site (together with the login information of participating Organizations, collectively hereinafter referred to as "Login Information").

Credentialing Information

When you choose to create or accept an Usher Badge for an Organization, certain information about you ("Credentialing Information") will be visible in the Usher ID App for other Users affiliated with such Organization to view or in the Usher Mobile App for Usher Mobile Users (as defined below) to view, in each case, as part of the verification process or Peer Discovery feature. Credentialing Information may include, for example, your name, organization, title, photo, email address, and phone number. We may collect the Credentialing Information.

License Information

In certain cases, you may have the opportunity to verify your identity by using the Usher ID App to scan your driver's license or other government-issued form of identification. If you choose to use this identity verification function, we will collect certain of your personal information directly from your driver's license or other form of identification, such as your first and last name, date of birth, picture and zip code ("License Information").

Biometric Information

We may collect your voice print or facial profile, which are considered biometric data (the "Biometric Information"). This Biometric Information may be used to validate your Credentialing Information when logging into the Service on a new device and to provide Administrators, Usher Mobile Users and other Users with a biometric means of confirming Credentialing Information.

Cookies

In addition, when you visit the Site, we may collect certain information by automated means, such as cookies. A "cookie" is a file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings on the device. The information we collect in this manner enables us to better serve you when you return to our Site – for example, it can "remember" your email address to save you having to enter it manually upon your return. We also use cookies to track responses to our marketing materials, such as emails and online advertisements. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. For more information about the Company's own cookies, please see ["How to work with Cookies."](#)

The Site may also feature cookies associated with certain unaffiliated companies. For example, we partner with other companies to provide you with connections to certain social networks, such as Facebook. By engaging with such other companies' sites, such companies may place cookies on your device. The use of these cookies is subject to such companies' own cookie policies, which we strongly recommend you review before you use the Site.

Web Analytics

We may use web analytics services on the Site, such as those of Google Analytics. The service providers that administer these services use technologies such as cookies to help us analyze how visitors use the Site. The information collected through these means (including IP address) is disclosed to or collected directly by these service providers, who use the information to evaluate use of the website.

To disable Google Analytics, please download the browser add-on for the deactivation of Google Analytics provided by Google at <http://tools.google.com/dlpage/gaoptout>. To learn more about other ad networks, including how to opt out, [click here](#).

Information We Collect When You Access the Service on a Mobile Device

When you have installed the Usher ID App on your mobile telephone or other mobile device, we collect a unique identification number that we assign to you, your IP address, phone model and operating system. In connection with the Applications, with your permission, we may collect your precise location information from your mobile device, including when you are not using the Usher ID App. In addition, even if you have not enabled location services for the Applications on your mobile device, we may derive your general location information from your use of the Applications, including from your Bluetooth signal when another User discovers you through the Service's Peer Discovery feature, or in connection with your use of Usher Badges to gain physical or logical access to locations or items associated with your Usher Badges (the precise and general location information are

collectively referred to as the “Location Data”, and together with the other information obtained from your mobile device, the “Mobile Information”). “Mobile Information” together with Usher Account Information, Third Party Information, Usage Information, Login Information, Credentialing Information, License Information and Biometric Information, are collectively hereinafter referred to as “User Information”.

How We Use Your User Information

The Company will use User Information for purposes of providing the Service and, in particular:

- to enable you to use the Service to organize your credentials, including your professional and social credentials
- to contact you when Administrators invite you to join their Usher Network by sending you an Usher Badge
- to validate your identity by using your driver’s license or other government-issued form of identification
- to integrate your Usher Badge with an existing Third Party Site account
- to log into a Third Party Site using an Usher Badge
- to use the Usher Keys feature to gain secure physical or logical access to locations or items associated with an Usher Badge, including printers, computer workstations, Third Party Sites and other websites or servers of participating Organizations
- to validate your Credentialing Information to other Users
- to validate your Credentialing Information on new or additional mobile devices
- to enable you to use the Service’s Peer Discovery feature to discover other Users in your Usher Network when such Users are in close proximity to your current location, and to allow you to save the Credentialing Information of such Users to the contact list on your mobile device
- to allow other Users in your Usher Network to use the Service’s Peer Discovery feature to discover you when such Users are in close proximity to your current location, and to enable such Users to save your Credentialing Information to the contact list on their mobile device
- to send you emails regarding your use of the Service
- to provide technical support and to respond to your inquiries
- to create and issue reports which may include reporting on your activity patterns, preferences and Location Data
- to enable Administrators to generate reports on Users within the Usher Network(s) for which they are the Administrator, including reports related to such Users’ activity patterns, preferences and Location Data
- to enable Usher Mobile Users to view information on Users within the Usher Networks(s) for which they are an Usher Mobile User, including information related to Users’ activity patterns, preferences and Location Data
- to enable Usher Mobile Users to use the Service’s Peer Discovery feature to discover Users in the Usher Networks for which they are Usher Mobile Users when such Users are in a specified range (set by the Administrator) from the Usher Mobile User’s current location, and to enable the Usher Mobile User to save the date, time, location or event where such Users were discovered as well as the Credentialing Information of such Users to the Usher Mobile App on their mobile device or to the Usher server
- to enable Usher Mobile Users to make calls, send text messages or send emails to other Users in such Usher Mobile User’s Usher Network via the Usher Mobile App

In addition, the Company may use User Information for the following purposes:

- to communicate with you about new features or promotions of the Company or Service
- to prevent fraud or potentially illegal activities
- to enforce our [Terms of Use](#)
- to solicit your feedback to improve the Service and your experience using it
- to administer and improve the Service, including by creating test reports on the User Information we collect, and

- to keep track of your activity patterns, preferences and Location Data in order to improve the level of service you receive from the Service and to provide reporting to Administrators and Usher Mobile Users.

We will not sell your personally identifiable User Information to advertisers or spammers.

How We Share Your User Information

We may share your User Information in the following cases:

- **With Affiliates and Third-Party Service Providers:** We may share your User Information with our affiliates (to see a list of MicroStrategy affiliates, click [here](#)) and third-party service providers. To receive a full list of all service providers, please contact us at the address specified in the “How to Contact Us” section below. Except as otherwise set forth in this section, we will only share your User Information with any such parties in connection with the administration of the Service or for the purpose of improving your experience with the Service. Third party service providers are not authorized by us to use or disclose your User Information except as necessary to perform services on our behalf or comply with legal requirements. If you have shared your Third Party Site Information with us, we will only disclose it to the extent permitted by such Third Party Site.
- **With Third Party Sites:** If your Usher Badge is integrated with a Third Party Site, we may share your User Information with the applicable Third Party Sites.
- **With Administrators:** We may share certain of your User Information with the Administrator of an Usher Network that you are a member of. Such User Information may include your Usage Information, your Credentialing Information, and your Mobile Information (including your Location Data).
- **With Usher Mobile Users:** The Service allows the Administrator of any Usher Network to provide other Users in such Usher Networks (each an “Usher Mobile User”) access to your Usage Information, Credentialing Information and your Mobile Information (including your Location Data) through the Usher Mobile App. We may share your Credentialing Information with other Usher Mobile Users in your Usher Network who are a specified distance (set by the Administrator) from the Usher Mobile User’s location. Usher Mobile Users will have the option to save your Credentialing Information to the Usher Mobile App on their mobile device or to the User server.
- **With Other Users:** If you do not deactivate the Service’s Bluetooth-enabled Peer Discovery feature, we may share your Credentialing Information with other Users in your Usher Network who are in close proximity to your current location (approximately 100 feet) using the Bluetooth signal on your mobile device. Such Users of the Usher ID App will have the option to save your Credentialing Information to the contact list on their mobile device. This functionality can be disabled by turning off the Usher ID App Bluetooth sharing functionality in the Settings of your mobile device. In that case, you will still be able to use your phone’s Bluetooth signal for other purposes.
- **With Other Third Parties:** We may share your User Information with other third-parties, in which case we will obtain your specific consent.
- **As Required by Law:** We may disclose any User Information when we believe, in our sole discretion, disclosure is necessary or appropriate to comply with any applicable law, regulation, legal process or governmental request.
- **To Protect Our Legitimate Business Interests:** We may disclose User Information when we believe, in our sole discretion, disclosure is necessary to protect the Company’s legitimate business interests.

- In Connection With a Sale of Our Business: We also reserve the right to transfer User Information in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use the User Information in a manner that is consistent with this Privacy Policy. Following such a sale or transfer, you may contact the entity to which we transferred the User Information with any inquiries concerning the processing of that information.

How We Protect Your User Information

We maintain administrative, technical and physical safeguards designed to protect the User Information that we collect about you against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

Transfers of User Information to Other Countries

The Company uses databases located in different jurisdictions. We may transfer User Information we collect about you to our databases located in countries other than your country of residence, including to countries which have laws requiring a different level of data protection compared to your country of residence. We will take all the necessary steps to ensure that such transfers of User Information comply with applicable data protection laws, in particular, the legal requirements on adequate protection for data transfers to countries outside of the European Economic Area.

Your Privacy Rights and Choices

To stop the Service from collecting your User Information at any time, uninstall the Usher ID App and the Usher Mobile App from all of your devices.

Subject to applicable law, we provide you with access to the User Information we have retained about you and the ability to review, correct, update, block or delete the information where it is inaccurate. Subject to applicable law, we may limit or deny access to your User Information where providing such access is unreasonably burdensome or expensive under the circumstances. Please submit your request to the address specified in the "How to Contact Us" section below.

Updates to This Privacy Policy

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our information processing practices or for any other purpose. We will post a notice on the Site to notify you of any significant changes to the Privacy Policy and indicate there and at the top of the Privacy Policy when it was most recently updated.

How to Contact Us

If you have any questions or comments about this Privacy Policy, please contact us by email at support@usher.com or telephone at 703-744-6529. You also may write to us at Usher Incorporated, 1850 Towers Crescent Plaza, Tysons Corner, Virginia 22182, Attn: Office of the General Counsel. Questions or comments submitted through other means, such as Wall posts, may not be received or addressed.

If you are located in the EU, you may also write to us at MicroStrategy Limited, Building 10, Chiswick Park, 566 Chiswick High Road, Chiswick, London, W4 5XS, Attn: Legal Department.