

SOFX PRIVACY POLICY

As Of: 25 August 2017

Introduction

SOFX is a professional network and online platform specifically designed to connect current, former, and future members of the global special operations and private military contracting community. The purpose is to allow them to communicate and exchange information of interest in a manner that is more secure than the average consumer-facing network within a trusted electronic environment. SOFX connects members and visitors with employers and brands in a relevant way, by presenting promotions and employment opportunities of specific interest to our network community. With SOFX, members are able to build and retain their status as members of a global warrior elite, share information with other members of the community, and explore career opportunities.

This privacy policy applies to www.sofx.com, www.sofxjobs.com, www.sofxblack.com, and future developments such as SOFX mobile applications, and all other SOFX consumer-facing products and services. Any information that you upload or sync with any SOFX property is covered by the User Agreement and this Privacy Policy.

BY ACCESSING OR USING SOFX WEBSITES, APPLICATIONS, OR ANY OTHER SOFX PRODUCT OR SERVICE, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND BY THIS PRIVACY POLICY AND OUR TERMS AND CONDITIONS. IF YOU DO NOT AGREE TO THESE TERMS, DO NOT USE SOFX. THIS POLICY APPLIES TO REGISTERED MEMBERS AND VISITORS ALIKE.

What Information Do We Collect From or About Consumers or their Devices?

Personal Information:

In this policy, Personal Information is information that can be used to identify a natural person. We collect the following Personal Information:

- when you sign up (whether on the App or the Website), and create or make changes to a SOFX profile, we collect the personal information you disclose on the account registration form and your profile, including your email address, password, contact information, first name, last name, gender, birthday, branch of service, rank, military specialty, current unit and duty station, professional experience or objectives, educational background, and any other information you provide at registration or add to your profile;
- if you communicate with us by email, we will collect your email address;
- when you access our Website or use the App, our servers will automatically recognize your IP address, and device IDs;
- if you submit content, you may, at your option, include information (such as your name or photograph) in the content that can be used to identify you.
- if you contact us for customer support, we may collect your contact information, and access your data associated with your account, including Content.

All of this information is referred to in this Policy as “Personal Information”.

Logging in via other Social Networks and Syncing Your Data

- If you login to SOFX using your account information for a Social Network Site, we access and collect information about your use of the Social Network Site and information you provide to such Social Network Site. To the extent you and the Social Network Site allow, we may access all of your information that is publicly available to other users of the Social Network Site and all information you have provided to the Social Network Site, such as login e-mail and other contact information, network statistics and updates regarding your Social Network Site account. You consent to such access and our collection, storage and use of this information in accordance with this Privacy Policy.

Automatically Collected Information

- **Web Tracking Information:** We may use web tracking technologies such as cookies, web beacons, pixel tags and clear GIFs in order to operate the Website efficiently and to collect data related to usage of the Website and to web and email marketing conducted by us or on our behalf. Such collected data (“Web Tracking Information”) may include the address of the websites you visited before and after you visited the Website, the type of browser you are using, your Internet Protocol (IP) address, what pages in the Website you visit and what links you clicked on, and whether you opened email communications we send to you. In order to collect Web Tracking Information and to make your use of the Website more efficient, we may store cookies on your computer. We may also use web tracking technologies that are placed in web pages on the Website or in email communications to collect information about actions that users take when they interact with the Website or such email communications. We do not correlate Web Tracking Information to individual user Personal Information. Some Web Tracking Information may include data, such as IP address data and general segment information that is unique to you. You may be able to modify your browser settings to alter which web tracking technologies are permitted when you use the Website, but this may affect the performance of the Website.

How Do We Use the Information We Collect?

We use the information we collect from or about you and your devices for a variety of purposes:

- Provide you with customized SOFX networking and communication services via our Website or other applications.
- Communicate with you about your SOFX account or profile, your transactions with us, features on our Website, and changes to our policies.
- To allow you to grow, manage, and leverage SOFX network:
- Consistent with local law and choices and controls that may be available to you we may use information collected from you, or from devices associated with you, to:
 - Connect you with employment opportunities
 - Show you offers and promotions for our products and services
 - Personalize content and experiences

- Provide you with advertising based on your activity on our sites and applications. To learn more about how we use your information for personalization and tracking, please see "Automatically Collected Information" below.
- Optimize or improve our products, services and operations
- Detect, investigate and prevent activities that may violate our policies or be illegal

Aggregate Information and Analysis: We will also use information we collect from or about you and your devices to create aggregated data for individual or summary analytical purposes. This statistical information does not contain any Personal Information and is used to understand our members and to better serve our market.

Tracking Information: We use Web Tracking Information to administer the Website and the App and to understand how well our services are working, to store your user preferences and customize the SOFX content you see, and to develop aggregate, statistical information on usage of the Websites. This allows us to determine which features visitors like best to help us improve our Website, to personalize your user experience, and to measure overall effectiveness.

Legal Exception: Notwithstanding the above, we may in any event use Personal Information and other information collected through the Website to the extent required by law or legal process, to resolve disputes, to enforce our agreements (including this Privacy Policy and the Terms of Service) with you, or if in our reasonable discretion use is necessary to protect our legal rights or to protect third parties.

Push Notifications: If you download and install the App, we will send you administrative and promotional push notifications, provided that you opt in to such notifications through the App settings.

Email Communications/Your Choices: If you create an account and provide your email address, we will send you administrative and promotional emails. If you wish to opt out of promotional emails, you may do so by following the "unsubscribe" instructions in the email, or by editing your account settings as described below. All users receive administrative emails, and so you cannot opt out of them while you remain an account holder.

What Information Do We Disclose to Third Parties?

None.

Advertising-related disclosures of information and Opt-Out instructions.

SOFX is a partially advertisement supported service, but we do not share your personal information with advertisers.

For another tool to opt out of tracking on 3rd party networks, click [here](#) to visit the Network Advertising Initiative site to set preferences and opt out of third party targeting programs.

Third-Party Analytics. We do use third-party analytics services, such as Google Analytics, to evaluate the performance of various features of our Website and App and also to evaluate the overall performance of our Website and App. We also use such services to understand whether and how specific users or users meeting a certain profile are taking advantage of certain features of our Website and App and/or making use of our Website and App generally. For more information about web analytics, including information on setting preferences for or opting out of certain data collection, please visit Google Analytics. If you choose to opt-out, some of the features of the Website and App may not be fully functional for you.

We do not share information that personally identifies you (personally identifiable information is information like name or email address that can by itself be used to contact you or identifies who you are) with advertising, measurement or analytics partners.

Network Operators: Use of the SOFX App may involve use of the services of third party telecommunications carriers. Such carriers are not our contractors, and any information that a carrier collects in connection with your use of the App is not “Personal Information” and is not subject to this Privacy Policy. We are not responsible for the acts or omissions of telecommunications carriers.

Additional Disclosures: We reserve the right to disclose any information we collect in connection with the App, including Personal Information, (a) to any successor to our business as a result of any merger, acquisition, asset sale or similar transaction; and (b) to any law enforcement, judicial authority, or governmental or regulatory authority, to the extent required by law or if in our reasonable discretion disclosure is necessary to enforce or protect our legal rights or to protect third parties.

Privacy Settings/E-Mail Preferences/Data Retention

If you would like to close your SOFX account or opt-out of email updates, please close your account. Your removal will not remove records of past transactions or delete information stored in our data backups and archives. Data on past transactions and data stored in backups and archives will be maintained and/or deleted in the ordinary course of SOFX’s business.

We retain the Personal Information you provide while your account is in existence or as needed to provide you services. We may retain your Personal Information even after you have closed your account if retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes between members, prevent fraud and abuse, or enforce this Privacy Policy and our Terms of Service. We may retain Personal Information, for a limited period of time, if requested by law enforcement.

Access and Updating of Information

You may review or amend your profile, email address, or contact details at any time by using your settings panel in your account online.

General

Security: We use reasonable security precautions to protect the security and integrity of your Personal Information in accordance with this policy and applicable law. However, no Internet transmission is completely secure, and we cannot guarantee that security breaches will not occur. Without limitation of the foregoing, we are not responsible for the actions of hackers and other unauthorized third parties that breach our reasonable security procedures.

Links: The SOFX website may contain links to other websites. SOFX is not responsible for the privacy practices or the content of those websites. Users should be aware of this when they leave our website and review the privacy statements of each third party website. This Privacy Policy applies solely to information collected by the Website.

Amendments: SOFX may modify or amend this policy from time to time. If we make any material changes, as determined by SOFX, in the way in which Personal Information is collected, used or transferred, we will notify you of these changes, which will be available for review by you at the Website. Notwithstanding any modifications we may make, any Personal Information collected by SOFX from you will be treated in accordance with the privacy policy in effect at the time information was collected, unless we obtain your consent otherwise.

You Must be 18 Years or Older to Participate in SOFX: SOFX does not knowingly collect or maintain personally identifiable information from persons under 18 years of age, and no part of the Website is directed at persons under 18. If you are under 18 years of age, then please do not use SOFX.

Website Visitors from outside the United States: SOFX and its servers are located in the United States and are subject to the applicable state and federal laws of the United States. If you choose to access or use the Website, you consent to the use and disclosure of information in accordance with this privacy policy and subject to such laws.

Effective Date of this policy:

August 25, 2017