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Privacy Policy

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Lucid Holdings, LLC Privacy Policy

Effective Date: May 29, 2019

Your privacy is important to us. As a result, we've developed this Privacy Policy ("Policy" or "Privacy Policy") that provides a description of how we collect, use, disclose, transfer, and store your Personal Information, as well as your choices regarding use, access and correction of your Personal Information. This Privacy Policy does not apply to data that we collect through other means, including data that we collect offline or via web or mobile Sites on which we do not post this Policy. Please take a moment to familiarize yourself with our privacy practices and let us know if you have any questions.

I. Introduction & Notice

a. Introduction

Lucid Holdings, LLC, Lucid Holdings International Limited, Lucid Holdings UK Limited, Lucid Holdings India Private Limited, Lucid Holdings International PTE. LTD., and Lucid Australia PTY LTD (collectively “Lucid”) is committed to ensuring the privacy of (i) those customers who use the Lucid Sites and Services (specifically, individuals acting at the direction of Suppliers, Buyers or other business customers, all of whom may be collectively referred to as “Clients”), and (ii) Respondents referred, brokered, qualified, accessed by, hosted on, or otherwise provided by or to Clients on or through the Sites (the individuals in the foregoing (i) and (ii) may be collectively referred to as “you” or “your”). This Policy describes what data is collected from or provided to Respondents or Clients, respectively, and how that data is used and disclosed. By using the Sites and Services, you consent to the terms of this Policy. This Policy was created to demonstrate our commitment to fair information practices. Our policies and procedures address applicable U.S. and international privacy requirements concerning the collection, use, and cross-border transfer of Personal Data.

As described more fully below, Lucid participates in and has certified its compliance with the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information from European Union member countries and Switzerland, respectively. Lucid has certified that it 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 policies in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

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

IF YOU DO NOT AGREE WITH THE TERMS IN THIS PRIVACY POLICY, DO NOT USE THE SERVICES AND SITES. CONTINUED USE OF THE SERVICES AND SITES CONSTITUTES YOUR FREELY GIVEN SPECIFIC AND INFORMED CONSENT AND AGREEMENT TO YOUR PERSONAL DATA BEING PROCESSED PURSUANT TO THIS POLICY.

b. Definitions

- **“Buyer(s)”** means the business entity accepting and entering into an agreement with Lucid for the purpose of acquiring Sample for Buyer Opportunities.
- **“Buyer Opportunity(ies)”** an engagement, campaign, or other project defined by a Buyer, such as Sample for a survey, a recruiting effort, or some other cost-per-action effort, that is sourced by one or more specific Supplier(s) or the Lucid Marketplace.
- **“Controller”** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- **“Data Subject”** means an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **“Lucid Marketplace”** means Lucid’s public cloud platform and application used to facilitate completed transactions between Suppliers and Buyers.
- **“Personal Data”** and **“Personal Information”** means any information relating to an individual that can be used to identify that individual either on its own or in combination with other readily available data.

- **“Pixels”** means small, graphic images on web pages, web-based documents, or in email messages that allow us or third parties to monitor who is visiting our Sites (or other third-party sites) or if an email has been read.
- **“Processor”** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the controller.
- **“Respondent”** means a natural individual who has been sent to the Lucid Marketplace by a Supplier and provided an opt-in consent to participate in a Buyer Opportunity.
- **“Respondent Screening Data”** means all data supplied, indexed, or otherwise transmitted by Suppliers or provided by their Respondents on or through the Lucid Marketplace for the purposes of asking and answering questions and attempting to qualify Respondents to complete Buyer Opportunities. This data includes, but is not limited to, IP Addresses, Cookie Identifiers, Device Identifiers transmitted by a Respondent’s device and qualifying demographic data received by the Supplier and/or submitted by the Respondent.
- **“Sample”** means access to Respondents who are made available by a Supplier on the Lucid Marketplace to answer questions and participate in Buyer Opportunities.
- **“Separate and Independent Controller”** means each party is a distinct Controller with regard to Personal Data and determines its independent legal basis for the processing of Personal Data received.
- **“Services”** means the services performed by Lucid as part of the Lucid Marketplace, Lucid Marketplace Services, Monetization Services, or other services, software or technology related to Data Score and Impact Measurement.
- **“Sites”** means the websites owned, maintained or licensed by Lucid, including but not limited to: luc.id, lucidhq.com, lucidhq.com, samplicio.us, techops.engineering, lucidhq.engineering.
- **“Special Categories of Data”** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural

person, data concerning health or data concerning a natural person's sex life or sexual orientation.

- **"Supplier(s)"** means any company with a user base of individuals willing to be Respondents on the Lucid Marketplace.
- **"User(s)"** means a user of our Services on behalf Clients.
- **"We", "our", and "us"** in this Privacy Policy refer to Lucid.

c. Regulatory Oversight

For this Privacy Policy and its content, Lucid is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). If Lucid becomes subject to an FTC or court order based on non-compliance with this policy or EU-U.S. and Swiss-U.S. Privacy Shield frameworks, Lucid shall make public any relevant Privacy Shield related sections of any compliance or assessment report submitted to the FTC, to the extent consistent with confidentiality requirements.

II. Collection of Personal Information

a. Authorized Users

The Sites are not intended for children under the age of 13. If you are under 13 years old, please do not provide information of any kind whatsoever on the Sites. If you are the parent of a child under 13 and believe your child has provided us with personal information, please contact us via Section X below and we will remove that information.

b. Usage and Browsing Information Your Devices Transmits

You can visit most of our Sites without registering or actively submitting Personal Data to us. If you do not register, general technical user data, such as your device's Internet Protocol (IP) address, operating system and browser type, and the date and time of your visit, may be automatically collected through the use of "cookies" (small files that

are stored on your computer by a website to give you a unique identification) or other technologies. For Users, cookies also keep track of services you have used, record registration information regarding your login name and password, ensure you do not repeatedly see survey questions, record your preferences and keep you logged into the Lucid Sites.

c. Information You Actively Submit

As a User of the Marketplace or Visitor to our Sites

If you register on our Sites as a user or sign up for our newsletter on behalf of a corporate customer (e.g., a client or supplier of market research sample), you will provide contact information such as your name, email address, mailing address and company affiliation.

As a Respondent

If you use our Sites as a Respondent, you will be prompted to provide certain demographic information about yourself and answer survey questions. In each such case, you know what information you provide and we collect, because you will actively submit the information.

d. Business Information

We do collect employee contact names, addresses, phone numbers and email addresses of our business partners, including buyers, suppliers and vendors, for the administration of our business relationships. If you feel that your Personal Data or personally identifiable information is being collected inappropriately, please notify us at privacy@luc.id.

e. Cookie Opt-Out

If you do not wish to participate in any of Lucid's online measurement and research services, please [click here](#) to receive an opt-out cookie.

Lucid's platforms and systems are cookie based, so for the opt-out to work for you, your browser must allow third party cookies.

For more information on Lucid's cookie usage, please see our [Cookie Policy](#).

f. Information Tracking Technologies

We may use, and allow third parties to use, Pixels (sometimes called web beacons) on our Sites (or other third-party sites) to monitor the effectiveness of survey qualifications. Pixels may be linked to your Personal Information, and they collect the IP address of the device to which the web beacon is sent (for geolocation lookup), the URL of the page the web beacon comes from, the user agent string (for device lookup), and the time it was viewed. We may also use third-party devices, links or electronic mail, to deliver surveys to you during which additional Personal Information may be collected. These third-party surveys or devices may use cookies, web beacons or other technology to collect information about your visits to our Sites (or other third-party sites) in order to present surveys that may be applicable to you. We may collect traffic information and data on and from the use of third-party sites on behalf of our customers. Lucid may use a Pixel or cookie to examine what is happening on third-party websites, including programs and sites with marketing and advertising partners, to improve the understanding of site traffic at a granular level, market research effectiveness and brand lift reporting.

Respondents that are hosted on, accessed by or routed through the third-party sites should consult the privacy policy and other policies of third parties through whom they are providing information. These third-parties may collect and use data that has been augmented by our services for their own services, which may include marketing and ad targeting, among other uses.

You can opt-out of receiving interest-based ads and tracking from third parties who are members of the Network Advertising Initiative (NAI) or who follow the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising by visiting the opt-out pages on the NAI website and DAA website.

(<http://www.networkadvertising.org/choices/>) and (<http://www.aboutads.info/choices/>).

g. Do Not Track

Some browsers have a "do not track" feature that lets you tell websites that you do not want to have your online activities tracked. These features are not yet uniform, and our website is not currently set up to respond to those signals for tracking on our website.

III. Purpose & Use of Collected Personal Information

a. Generally

Users

We use your Personal Information to operate, evaluate and improve our business (including developing new products and services; enhancing and improving our Services; managing our communications; and analyzing our products).

If you provide us with your name and contact information, we will use this data to answer requests from you, communicate with you regarding any Services we are providing to you as well as inform you about new products and services (unless and until you opt-out of marketing information).

Respondents

If you come to our Sites as a Respondent to qualify for or take surveys, we use the demographic information you provide to make your survey answers more meaningful to us and our clients. We may also use information derived from cookies, pixels and other technologies to determine your interest in particular surveys, advertisements and other communications.

b. Combination & Synchronization

We may combine and synchronize information that your device transmits, information that you actively submit and information that we obtain from third party sources (including suppliers of market research sample and data marketing platforms that may direct you to our Sites to answer demographic questions about yourself in preparation for your completion of surveys, and web publishers, advertisers, data brokers and online service providers that may have obtained information from you or your devices via cookies, pixels, and other tracking technologies).

c. General Data Protection Regulation (GDPR)

i. Respondent Screening Data

In order to deliver the Services, we require opt-in consent from European Union Respondents prior to the collection and processing of your Personal Data.

- **Marketplace**
 - You have been routed to Lucid's Marketplace by your referring company (Supplier), and prior to using our Site, you must consent to our collection of your Personal Data. The following scenarios apply:
- **Personal Data You Provide to Lucid**
 - Lucid acts as a Controller of the Personal Data you actively submit within our Marketplace.

- **Personal Data Sent to Lucid By Your Supplier**
 - Lucid acts as a Separate and Independent Controller of the Personal Data received by Lucid from your Supplier.

- **Personal Data Sent By Lucid to its Buyers**
 - The Personal Data we collect on our Sites pursuant to your opt-in consent may be shared by Lucid with our Buyers, and as such, our Buyers then become Separate and Independent Controllers of that Personal Data.

- **Marketplace Services**
 - Lucid offers managed services to our Clients (“Marketplace Services”). Lucid uses your Personal Data we collect directly on our Sites and via other external third-party survey hosting platforms to perform Marketplace Services. Personal Data collected via other external third-party hosting platforms may be transferred to Lucid’s Sites in the performance of Marketplace Services. With regard to the control and processing of your Personal Data in connection with Marketplace Services, Lucid and our Clients become Separate and Independent Controllers of that Personal Data.
 - The opt-in consent you provide to Lucid allows us to collect Personal Data from Suppliers and share this Personal Data with our Clients. Lucid will share your Personal Data with a Client only if the company warrants that it has a lawful basis as a Separate and Independent Controller for processing your Personal Data.

- **Monetization Services**
 - Lucid offers technology and Services to Suppliers. Certain Personal Data may be exchanged between Suppliers and Lucid to facilitate the efficient matching of you to appropriate Buyer Opportunities. When you provide your opt-in consent to Lucid, as also described under the Marketplace section, you consent to our sharing of that data with Buyers for the purpose of matching you to a Buyer Opportunity.

- **Audience (Data Score & Impact Measurement)**

- Lucid provides measurement Services to Clients that are global advertisers, agencies, advertising technology partners who wish to improve the relevance and impact of digital advertising campaigns. When on our Sites, you may receive an anonymous survey based on your exposure to an ad campaign or a third party identifier that is linked to your online profile via our tracker or one of our data partners. Information you share about your demographics, lifestyles, interests and opinions is used by Lucid to sell Services that help Clients make better advertising decisions and improve accuracy of their targeting in digital channels; such data may become Respondent Screening Data. While we provide this information on a Respondent level to our Clients, we contractually prohibit our Clients from reidentifying you for the purpose of retargeting an advertising message.
- **Third-Party Data Management Platforms (DMP) Services & Integrations**
 - Lucid provides your Personal Data to DMPs for the following purposes:
- **Targeted Advertising**
 - Lucid shares your Personal Data via data synchronizations with DMPs who may use this information to gain insights and improve the accuracy of their targeted advertising products sold by DMPs and Lucid's Clients.
 - NOTE: While Lucid prohibits DMPs and Clients from retargeting you, if you delete your cookies we may lose the ability to associate your profiles on our Sites; as a result, your profile may be indirectly associated within a particular segment at which time you could receive targeted advertising products.
- **Improved Survey Targeting**
 - Lucid exchanges your Personal Data with DMPs to better understand metadata associated with your profile, which may then be used by Lucid to perform Services on behalf of its Clients.
- **Advanced Analytics.**

- Lucid shares your Personal Data with DMP, which is used by them to perform advanced analytics and customer research on behalf of Lucid's Clients.

ii. Marketing Using Personal Data of Non-Respondents

Lucid processes Personal Data of non-Respondents, including Users, business contacts, and other visitors to our Sites, given our legitimate interest in undertaking marketing activities to offer you products or services that may be of interest. We may process your Personal Data via mail, live phone calls not on a "do not call list", emails, and text messages.

iii. Personal Data Provided under Section V

Personal Data provided to enforce subject access rights pursuant to Section V of this Policy will be used only to respond to and comply with such requests.

IV. Information Retention & Accuracy

We take reasonable steps to ensure that Personal Information we receive, process, or maintain is accurate, complete, and reliable for its intended use. We rely on the accuracy of the information provided directly to us but accept responsibility for the management and confidentiality of the Personal Information collected.

In general, we keep Personal Information only as long as we need it to provide you the Services you requested. We may also process data on behalf of third parties who have engaged us. We keep Personal Information processed on behalf of third parties for as long as needed to provide Services to third party in question. However, we reserve the right to retain Personal Information for any period required by law or

to comply with our legal obligations, resolve disputes, and enforce our agreements.

V. Sharing of Personal Information and Accountability for Onward Transfer

a. User Data from Our Sites (other than from the Lucid Marketplace).

When we have collected your first and last name in combination with other identifying Personal Data while using our Sites, we will only externally share that data as follows:

- With your consent;
- With affiliated and unaffiliated service providers all over the world that help us deliver our Services and run our business and Sites;
- When and as required by law including to meet national security requirements or to protect you, other users, us or third parties from harm, including fraud, data security breaches or where someone's physical safety seem at risk; or
- In connection with a reorganization or sale of our company or assets, subject to the acquirer accepting the commitments made in this Policy and ensuring that the transfer is in compliance with applicable law.

b. Respondent Screening Data from the Lucid Marketplace

We share your Respondent Screening Data, information collected via the Lucid tracking pixel, as well as data identified from third party databases (data management platforms) with third party partners and Clients. They may use this data to help them understand consumer trends, measure effectiveness of advertising campaigns and make better media decisions. While some of this information may be used by our third party partners and Clients to inform targeting models, we contractually prohibit them from using any information we

provide for the purpose of directly retargeting you via their advertising.

c. EU-U.S. and Swiss-U.S. Privacy Shield Principles

Additionally, Lucid may share your Personal Information with third party service providers and/or subprocessors, without your prior consent, subject to Lucid doing the following:

- transfer such data only for limited and specified purposes;
- ascertain that the subprocessor is obligated to provide at least the same level of privacy protection as is required by EU-U.S. and Swiss-U.S. Privacy Shield;
- take reasonable and appropriate steps to ensure that the subprocessor effectively processes the Personal Information transferred in a manner consistent with the organization's obligations under EU-U.S. and Swiss-U.S. Privacy Shield;
- require the subprocessor to notify Lucid if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by EU-U.S. and Swiss-U.S. Privacy Shield;
- upon notice, including under (iv), take reasonable and appropriate steps to stop and remediate unauthorized processing; and
- provide a summary or a representative copy of the relevant privacy provisions of its contract with that subprocessor to the U.S. Department of Commerce upon request.

Lucid shall remain liable under the EU-US Privacy Shield Principle of Accountability for Onward Transfer if its subprocessors process your Personal Information in a manner inconsistent with the [Privacy Shield Principles](#), unless Lucid proves it is not responsible for the event giving rise to the damage.

Please see our [Lucid + Subprocessors](#) webpage to view a current list of subprocessors and to subscribe to be updated when there are

changes to the list.

If you are visiting this website from a country other than the country in which our servers are located, your communications with us will result in the transfer of information across international boundaries. By visiting this website and communicating electronically with us, you consent to such cross-border transfers. In the case of data transfers from the EEA and Switzerland, the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks apply.

VI. Protection of Personal Information

Lucid uses reasonable security measures in an effort to prevent loss, misuse and alteration of data under our control. However, we cannot guarantee the security of information on or transmitted via the Internet. We rely on various security procedures and systems to ensure the secure storage and transmission of data, including encryption and authentication technology licensed from third parties, to effect secure transmission of confidential information. Additionally, we have absolutely no control over the security of other sites you might visit, interact with or do business with.

If we learn of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. Lucid may post a notice on the Lucid Site if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive a free written notice of a security breach (or to withdraw your consent from receiving electronic notice) you should notify us.

VII. Limits to Your Privacy

Our Sites may contain links to external websites, and areas where you can provide information to third-parties. These are provided for your convenience only, and we do not have control over the content or privacy and security practices and policies of such third parties or third-party sites. Any Personal Information you provide in such areas, and on such linked pages is provided directly to that third party and is subject to that third party's privacy policy. Please learn about the privacy and security practices and policies of external websites and third-parties before providing them with Personal Information.

VIII. Choice Regarding Collection, Use & Distribution of Personal Information

You can choose to opt-out whether your Personal Information is (i) to be disclosed to a third party or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individuals. If you choose to opt-out, please contact us via email at privacy@luc.id. In such an event, you will only be able to access public areas of the Sites and may be limited in the use of Lucid's Sites. In certain cases, limiting the use and disclosure of your Personal Data may impact functionality or prevent the use of Lucid products or Services.

IX. Access & Correction

If you register as a Buyer or Supplier, you can update, correct, or delete your user information and email subscription preferences by going to the log-in section of our Sites.

You have the right to access the Personal Information we hold about you.

You may also access your information that Lucid holds by contacting us at the address below. You have the right to correct, amend, or

delete that information where it is inaccurate, or has been processed in violation of the Privacy Shield Principles, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.

We maintain processes or mechanisms to allow you to review, update, correct or delete Personal Information held by us. You may make changes to your account information, access, correct, or delete Personal Information held by Lucid by contacting us at:

Lucid Holdings, LLC

Attn: Pauline Wen, General Counsel & Chief Privacy Officer

365 Canal Street

Suite 3100

New Orleans, LA 70130

United States of America

Email: privacy@luc.id

To protect your privacy and security, Lucid may also take reasonable steps to verify your identity before making corrections to or deleting your information. We will respond to your request for access to modify or delete your information within a reasonable timeframe.

X. Contacting Lucid, Dispute Resolution, Arbitration & Cost

Lucid will address all questions, complaints or requests concerning this Privacy Policy within 30 days of receipt.

- For EU Respondents, please use our Respondent [Data Rights Portal](#) to inquire about your rights
- For EU Business Partners, Employees & Contractors please use our Business Partner, Employee & Contractor [Data Rights Portal](#) to inquire

about your rights.

Please see the applicable details below:

a. EU & Swiss Citizens

In compliance with the EU-U.S. and Swiss-U.S. Privacy Shield Principles, Lucid commits to resolve complaints about your privacy and our collection or use of your Personal Information. European Union and Swiss individuals with inquiries or complaints regarding this Privacy Policy should first contact Lucid at:

Lucid Holdings, LLC

Attn: Pauline Wen, General Counsel & Chief Privacy Officer

365 Canal Street

Suite 3100

New Orleans, LA 70130

United States of America

Email: privacy@luc.id

Lucid has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to the INSIGHTS ASSOCIATION PRIVACY SHIELD PROGRAM, a non-profit alternative dispute resolution provider located in the United States and operated by the Insights Association. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.insightsassociation.org/get-support/privacy-shield-program/privacy-shield-eu-swiss-citizens-file-complaint> for more information and to file a complaint. These dispute resolution services are provided at no cost to you.

If your complaint is not resolved after following the recourse mechanisms described above, you may have the ability to invoke

binding arbitration. Additional information is available [here](#).

b. Non-EU/Non-Swiss Citizens

Lucid commits to resolve complaints about your privacy and our collection or use of your Personal Information. Non-EU/Non-Switzerland citizens with inquiries or complaints regarding this privacy policy should contact Lucid at:

Lucid Holdings, LLC

Attn: Pauline Wen, General Council, Chief Privacy Officer

365 Canal Street

Suite 3100

New Orleans, LA 70130

United States of America

Email: privacy@luc.id

c. Mandatory Arbitration Agreement, Class-Action Waiver, and Jury Waiver

Any dispute with our business partners arising out of or in connection with this Privacy Policy and not satisfactory addressed by Lucid or Insights Association will be governed as to all matters, including, but not limited to the validity, construction and performance of this Agreement, by and under the laws of the State of New York, United States of America, without giving effect to conflicts of law principles thereof and excluding the U.N. Convention on the International Sale of Goods. (i) The Parties agree to maintain the confidential nature of all disputes and disagreements between them, including, but not limited to, informal negotiations, mediation or arbitration, except as may be necessary to prepare for or conduct these dispute resolution procedures or unless otherwise required by law or judicial decision. Except as provided in Section X.c (ii), each Party agrees that before it

seeks mediation, arbitration, or any other form of legal relief, it shall provide written notice to the other of the specific issues in dispute (and referencing the specific portion of any contract between the Parties and which are allegedly being breached). Within thirty (30) days after such notice, knowledgeable executives of the Parties shall hold at least one meeting (in person or by video- or tele- conference) for the purpose of attempting in good faith to resolve the dispute. Except as provided in Section X.c (ii), any and all disputes, claims or controversies arising out of or relating to this Agreement shall be submitted to JAMS for mediation before arbitration or any other form of legal relief may be instituted. Mediation may be commenced by a Party providing JAMS a written request for mediation setting forth the subject of the dispute and the relief requested. The Parties will cooperate with JAMS in selecting a single mediator and scheduling a mediation, which should take place within forty-five (45) days following a request for mediation. The mediator shall be a retired judge who has had experience with technology disputes, but the mediator shall not have the authority to award punitive or exemplary damages. The Parties agree that they will participate in good faith and share equally in its costs. The mediation shall take place in New Orleans, Louisiana. (ii) The dispute resolution procedures in this Agreement shall not apply prior to a Party seeking a provisional remedy related to claims of misappropriation or ownership of intellectual property, trade secrets, or Confidential Information.

XI. Changes to Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will prominently post those changes here and any other place we deem appropriate, so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make any material

changes, we will notify you by way of an email (sent to the email address associated with your account) or by means of a notice on this site prior to the change becoming effective. We will use information in accordance with the privacy policy under which the information was collected.

We use a self-assessment approach to address compliance with this Privacy Policy, verifying periodically that the policy is accurate, comprehensive, and addresses the privacy requirements applicable to the markets we serve. Periodically, our operations and business practices are reviewed for compliance with corporate policies and procedures governing the confidentiality of information. These reviews are conducted by internal staff who report directly to our General Counsel.

**We're changing
the way the
world's answers
are discovered.**

Support

[Lucid Support](#)

[Developers](#)

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[Privacy Policy](#)

[Legal](#)

[Trust Center](#)

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Products

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Solutions

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