

Privacy Policy

Last updated: December 2, 2021

This Privacy Policy (“**Privacy Policy**”) describes the policies and procedures of the Denver Metro Chamber of Commerce (“**We**” “**Us**” or “**Our**”) regarding the types of information We may collect from a user of the Prosper Compass software (“**You**” or “**Your**”) when You use the Prosper Compass software (“**Compass**”) and describes our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy incorporates by reference all the terms in the Privacy Statement for the Denver Metro Chamber of Commerce, as updated (the “**Privacy Statement**”), located at <https://denverchamber.org/privacy-policy/>. By using Compass, You agree to the collection and use of information in accordance with this Privacy Policy, and You represent and warrant that You have the legal right and ability to enter into this Privacy Policy on behalf of the company whose data You are transmitting through Compass (“**Company**”).

Definitions

In addition to the terms defined above, as used in this Privacy Policy:

- “**Company Data**” means any information that is transmitted through Compass and relates to the Company.
- “**Usage Data**” means data that is collected by Us automatically, either generated by Your use of Compass or from Compass infrastructure itself, including all data listed under the heading “Collection of Your Personal Information” in the Privacy Statement.

Collecting and Using Your Data

Types of Data Collected

Company Data

We may ask You to provide Us with certain Company Data that can be used to contact or identify You or employees of Your Company. Company Data may include, but is not limited to the e-mail address, name, home or work address or telephone number of the user, and anonymized statistics about Your employees which are aggregated by different diversity characteristics.

Usage Data

In addition to all Usage Data collected in accordance with the Privacy Statement, when You access Compass by or through a mobile device, We may also collect certain Usage Data automatically, including, but not limited to, the type of mobile device You use, Your mobile device’s unique identifier, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, and other diagnostic data.

We may also collect information that Your browser sends whenever You visit Compass or when You access Compass by or through a mobile device.

Use of Your Company Data and Usage Data

In addition to the rights granted to Us in the Privacy Statement, We may use Company Data and Usage Data for the following purposes:

- To provide and maintain Compass, including to monitor the usage of Compass.
- To manage the unique account created for You to access Compass or parts of Compass. The Company Data You provide can give You access to different functionalities of Compass that are available to You as a registered user.
- To contact You regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To attend to and manage any requests that You submit to Us.
- To use Your Company Data and Usage Data for other reasonable purposes, such as data analysis, identifying usage trends, and evaluating and improving Compass, the products, the services, and your experience.

We may share Company Data in the following situations:

- **Transparency levels:** We will honor the transparency level selected by You within Compass regarding your Company presence in Our public reports. We will obscure Your Company's identity based on the following transparency levels:
 1. Your Company is willing to input the Company Data into Compass and receive its comparison report, but You do not want the Company Data shared with any entity outside of Us or stored by Us for more than seventy-two (72) hours after the comparison report is delivered.
 2. Your Company is willing to input the Company Data into Compass, and receive its comparison report, and through the assignment of a random code, Your Company will remain anonymous in public reports but You will be able to compare any year-over-year changes in the Company Data by accessing Compass.
 3. Your Company is willing to input the Company Data into Compass, and receive its comparison report, and be identified in public reports by Your industry sector, but not by the Company's name.
 4. Your Company is willing to input the Company Data into Compass, and receive its comparison report, and be identified in public reports generally as a participant, but not associated directly with the Company Data.
 5. Your Company is willing input the Company Data into Compass, and receive its comparison report, and be identified in public reports directly in correlation with the Company Data. We will notify You before the Company name appears in any public reports.

With Your consent: We may disclose Your Company Data for any other purpose with Your written consent.

Retention of Your Company Data and Usage Data

We will retain Your Company Data only for as long as is necessary for the purposes set out in this Privacy Policy. We may retain Usage Data for Our internal purposes indefinitely. Notwithstanding the foregoing sentences, We reserve the right to retain Company Data and Usage Data for any period of time as we reasonably believe necessary to comply with any legal data retention obligations.

Transfer of Your Company Data and Usage Data

Your Company Data and Usage Data is stored and processed through Google Firebase. This means that Company Data and Usage Data 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 any Company Data and Usage Data represents Your agreement to that transfer.

We will take all steps reasonably necessary to ensure that Your Company Data and Usage Data is treated in accordance with this Privacy Policy (including the language under the heading “Security of Your Personal Information” in the Privacy Statement).

Disclosure of Your Company Data and Usage Data

Law enforcement

We may disclose Your Company Data or Usage Data if required or reasonably requested to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

We may disclose Your Company Data or Usage Data in the good faith belief that such action is necessary to:

- comply with a legal obligation,
- protect and defend Our rights or property,
- prevent or investigate possible wrongdoing in connection with Compass,
- protect the safety of users of Compass or the public, or
- protect against legal liability.

Security of Your Company Data and Usage Data

We will secure any disclosed personal information from unauthorized access, use or disclosure. We secure the personally identifiable information You provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, You can contact us: <https://www.prosperco.org/contact-us/>