Personal and Privacy by Design

Personal (www.personal.com) is a life management platform that gives individuals ownership, control of, and benefit from their personal data. Central to this mission is the privacy, security and trust of Personal's users, who we call "owners." These principles guide our platform and functionalities.

1. Proactive not Reactive; Preventative not Remedial

Personal has developed and deployed privacy and security safeguards throughout our technological architecture and owner functionality. For example:

- Sensitive data can only be accessed with an owner-chosen password that Personal does
 not store and therefore cannot access. Personal uses bcrypt to hash passwords, which has
 built-in salting and stretching.
- If an owner forgets his or her password and needs to reset it, sensitive data will be deleted for the owner's own protection.
- We don't allow others to track owners while they are on Personal, and Personal doesn't track individuals when they leave the website or app.
- Our culture makes privacy and security the business of every employee. All Personal
 employees undergo rigorous background checks, and everyone on our technical teams
 receives security training.

2. Privacy as the Default Setting

Privacy and control over sharing data are default settings for owners. For example:

- Any instance of sharing, importing or adding data within Personal is an owner-initiated event.
- Personal uses default 256-bit SSL encryption for all data transmitted from browser to
 database to prevent others from eavesdropping, including all pages and APIs involving
 the exchange of passwords or personal information. Personal uses secure cookies with
 HTTPS to further protect owner data. Sensitive data is encrypted at rest in our servers,
 which are hosted at a major U.S. facility with, among other safeguards, 24/7 monitoring
 and biometric security.
- We have spent significant resources avoiding the use of third-party analytics and other tools that "phone home" and reveal to a third party what an owner does on Personal.

3. Privacy Embedded into Design

In addition to our technology, Privacy by Design guides our business practices. Upon registering to join Personal, an owner signs our Owner Data Agreement, which is a revolutionary, legally binding contract that says the data an owner chooses to manage in Personal belongs to them and no one else, including Personal. Other examples of our business practices include the following:

- Only the owner can grant access to his or her data stored in Personal.
- Personal will never grant any third party access to owner data, except when specifically required by law. In those cases, we would only be able to produce sensitive data in encrypted form.
- Other owners and our corporate and app developer partners may not access, use, store, share, or monetize owner data that is shared with them through Personal without the initial owner's explicit consent.
- Owners can export their own data at any time, including if they choose to leave Personal and would like a copy of their data. We have also built a true delete button into the system, so that owners can permanently delete the information in their vault.

4. Positive Sum

At Personal, privacy, security and functionality were built into our platform and product from the beginning. Personal's technology and user interface demonstrate that it is possible to create a user-driven platform that embeds all these principles in the company without trade-offs. The result is a secure personal data vault that empowers individuals to own, control access to, securely share, and benefit from their information.

5. Full Lifecycle Protection

Privacy and security are central to an owner's experience and lifecycle use of our product. For example, to afford full lifecycle control over one's data in Personal, we enable owners to export and/or delete the data in their vault.

6. Visibility and Transparency

We believe that people should have clear visibility into the information they choose to manage in Personal and full transparency about who can access the information stored in their vault. For example, each owner has a "Feed" showing the specific information shared with others in his or her network and the data that individuals in the owner's network have shared with the owner. Owners can also access this information through the "Network" tab, which displays an owner's contacts along with the information that has been exchanged with the contact.

7. Respect for User Privacy

Personal was founded on the idea that the time has come for a truly user-driven model that gives individuals control over and benefit from their personal data.