



Ethena Privacy Policy

This Privacy and Data Security Policy will help you understand what information we collect and use at Ethena, and the choices you have associated with that information. When we refer to “Ethena,” “we,” “our,” or “us” in this policy, we are referring to Ethena, Inc., and its subsidiaries and affiliates, which provides services to you pursuant to the Service Agreement between you and Ethena. The use of information collected by Ethena shall be limited to the purpose of providing the services for our customers and as specified herein. Ethena follows generally accepted standards to protect any information submitted to us, both during transmission and once it is received, however, no security measure is perfect. One of the easiest ways you can manage the security of your own account is with the use of strong passwords. Your use of Ethena’s services constitutes agreement to the following policy.

Data We Collect

There are three types of data we collect.

- Administrator generated data:
 - Employee information excluding protected demographic information (e.g. race, gender, age).
 - Uploaded company policies.
 - Note that we do *not* directly collect payment information; see the Data Storage section below for more information on this.
- Employee generated data:
 - Optionally self-reported protected demographic information (e.g. race, gender, age).
 - Training response data. This includes employee answers to check-on-learning exercises and employee answers to culture pulse surveys.
 - Note that we do *not* directly collect authentication information (i.e. passwords); see the Data Storage section below for more information on this.
- System generated data:
 - Tracking (via browser-based cookies) and monitoring data generated while interacting with Ethena’s browser-based application.
 - Tracking (via pixel tracking) data generated while interacting with emails sent by Ethena.

How We Collect Data

- We collect the data you provide to us.
- We use "cookies" and other technologies to collect data that enable us to better understand and improve the usability, performance and effectiveness of our services.

Cookies are files sent to your browser and stored on your computer. We use cookies to gather general information about your use of Ethena's browser-based application, the configuration of your computer and your computer's interaction with Ethena's browser-based application, and store this data in log files. We use this data to improve our service, provide the best online experience possible, and improve our customer service. We use the following types of cookies on our site:

- Strictly necessary cookies - These cookies are essential in order to enable you to navigate and use our services.
- Performance cookies - These cookies collect data about how you use the services. These cookies don't collect personal data and are only used to improve how the services work.
- Functionality cookies - These cookies allow the Services to remember choices you make, such your preferences, to provide enhanced, more personal features.
- Other Technologies - We may also use other Internet technologies, such as web beacons or pixel tags and other similar technologies, to deliver or communicate with cookies and analyze your use of the services. We also include web beacons in e-mail messages so that we know when you have opened or interacted with an email message received from Ethena.

You may disable cookies by changing the settings on your browser, phone and/or devices. Check your browser's or device's help or support menu for further information. Remember that if you disable cookies it is likely to affect how the Ethena's browser-based application works and you may not be able to access or use certain features. Unless you have adjusted your settings so that it will refuse cookies, we will place cookies when you use Ethena's browser-based application.

Online Tracking

Do Not Track (DNT) is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by websites and online services. We do not recognize DNT.

How We Use Data

We use data for the following purposes:

- To provide you with the Ethena services.
- We collect data through unique identifiers (such as IP address).
- To administer your account.
- To communicate with you about your account or interactions with us and send you details or updates about our services or changes to our policies.
- To process payments.
- To create anonymized and aggregated data sets that may be used for a variety of purposes, including research, internal analysis, analytics, or other functions.
- To ensure consistency with local law and choices and controls that may be available to you.
- To detect, investigate and prevent activities that may violate our policies or be illegal.

- To detect errors, monitor usage, improve the quality of our product and otherwise measure the effectiveness of our product.

How We Share Data

- Client-Internal:
 - Employees' self-reported protected demographic information is not shared with company administrators except in anonymized, aggregate statistics.
 - Employees' check-on-learning training data may be shared with company administrators.
 - Employees' answers to culture pulse surveys are not shared with company administrators except in anonymized, aggregate statistics.
- Third Parties:
 - Ethena only makes money through what our customers pay us; we do not sell any data to third parties.
 - We do not share any of our data with third parties, except in the following limited circumstances:
 - When we contract or partner with a third party to provide services on our behalf, such as our cloud service provider (Amazon) and our application hosting service (Heroku). We require all third parties to process your data in accordance with this Privacy Policy.
 - For anonymized derivative works of the training response data mentioned above. When doing this, we do not disclose any data in a manner that identifies a client or the individual training recipients.
 - In connection with the sale of a business (including merger, acquisition, or sale of all or a material portion of its assets or change in corporate control.)
 - To enforce our Terms of Service or rules, to ensure the safety and security of our users and third parties, to protect our rights and property and the rights and property of our users and third parties, to comply with legal process, including judicial warrant, rule, order or subpoena or in other cases if we believe in good faith that disclosure is required by law or regulation.

Data Storage

- Ethena stores data in a database provided by Amazon, and encrypted data moves between this database and our application hosted on Heroku.
- Ethena does not store any payment information; payment information is encrypted and transmitted directly from the client to our third party payment provider. Our third party payment provider, Stripe, makes their [privacy](#) and [security](#) policies available on their site.
- Ethena does not store any authentication information (i.e. passwords); passwords are encrypted and transmitted directly from the client to our third party authentication provider. Our third party provider, Auth0, makes their [privacy](#) and [security](#) policies available on their site.

Access Control

- Ethena does not grant employees access to any systems which they do not need to perform their duties.
- Ethena mandates that employees use a password manager, do not use the same password across systems, and enable multi-factor authentication whenever available.

Changes to this Statement/Contact Us

We may update this Policy to reflect changes to our data privacy practices. If we make any material changes, we will provide notice on goethena.com, and we may notify you by email (sent to the email address specified in your Service Agreement), prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. If you continue to use the Services after those changes are in effect, you agree to the revised policy.

If you have any other questions about this policy please contact info@goethena.com.

Last Updated: January 16, 2020