

# Privacy Policy

Effective as of 3/26/2024

**California residents:** If you are a California resident, please read the [Notice to California residents](#) below in addition to this Privacy Policy for information about your personal information and privacy rights.

**Users in Europe and other countries outside the US:** If you are located in the European Economic Area (the “EEA”), the United Kingdom (the “UK”), or other country outside the US, please read the **Notice to Users in Europe and other countries outside the US** below in addition to this Privacy Policy for information about your personal information and your privacy rights to the extent the laws of such jurisdiction are directly applicable to our processing of your personal information.

This Privacy Policy describes how Maxcess and our subsidiaries and other affiliates (“**Company**,” “**we**,” “**us**” or “**our**”) may collect and process personal information that through our digital or online properties or services that link to this Privacy Policy (collectively, the “**Service**”). Not all data collections or processing described herein may apply to you or your data. We may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information.

The Company delivers customized end-to-end web handling solutions. This Privacy Policy does not apply to information that we process on behalf of our business customers (such as businesses and other organizations) while providing our services to them.

Our websites, products and services are designed for enterprise customers and their representatives. We do not offer products or services directly to individuals for their personal, family or household purposes. Accordingly, we treat all personal information we collect as pertaining to individuals in their capacities as representatives of the relevant enterprise and not their individual capacities.

You can download a printable copy of this Privacy Policy

## Index

### Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- Public sources, such as government agencies, public records, social media platforms, and other publicly available sources.
- Marketing partners, such as joint marketing partners and event co-sponsors.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

### How we use your personal information

Service delivery and operations. We may use your personal information to:

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services. As part of these activities, we may create aggregated, de-identified and/or anonymized data from personal information we collect. We make personal information into de-identified or anonymized data by removing information that makes the data personally identifiable to you. We may

use this aggregated, de-identified or otherwise anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- Direct marketing. We may send you Company-related or other direct marketing communications as permitted by law, including by email. You may opt-out of our marketing communications as described in the Opt-out of marketing section below.
- Interest-based advertising. Our third-party advertising partners may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms.

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

Compliance and protection. We may use your personal information to:

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

## **How we share your personal information**

### **Your choices**

Opt-out of communications. You may opt-out of marketing-related emails and other direct marketing communications by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Blocking images/clear gifs: Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track". To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

### **Other sites and services**

**The Service may contain links to third party websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions, nor are they subject to this Privacy Policy. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.**

### **Security**

**We employ a number of technical, organizational and physical safeguards designed to protect the**

personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

#### International data transfer

We are an international company and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

#### Children

The Service is not intended for use by anyone under 16 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

#### Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledgment that the modified Privacy Policy applies to your interactions with the Service and our business.

#### How to contact us

##### Notice to users in Europe and other countries outside the US

Controller. The Company is the controller in respect of the processing of your personal information covered by this Privacy Policy for purposes of European or other data protection legislation (i.e., the EU GDPR and the so-called 'UK GDPR' (as and where applicable, the "GDPR")). See the How to contact us section above for our contact details.

In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a "legal basis" for that use.

Our legal bases for processing your personal information described in this Privacy Policy are listed below.

## Personal information we collect

**Information you provide to us.** Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, salutation, email address, billing and mailing addresses, professional title and company name, and phone number.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, communicate with us via chat features, social media, or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third-party sources.** We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.

- **Private sources**, such as data providers, social media platforms and data licensors.
- **Our affiliate partners**, such as our affiliate network provider and publishers, influencers, and promoters who participate in our paid affiliate programs.
- **Marketing partners**, such as joint marketing partners and event co-sponsors.

**Automatic data collection.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages you viewed, how long you spent on a page, the website you visited before browsing to the Service, navigation paths between pages, information about your activity on a page, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Communication interaction data** such as your interactions with our email or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

**Cookies.** Some of our automatic data collection is facilitated by cookies and similar technologies. For more information, see our [Cookie Notice](#). We will also store a record of your preferences in respect of the use of these technologies in connection with the Service.

## How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery and operations.** We may use your personal information to:

- provide, operate and improve the Service and our business;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
- administer and communicate with you about events or contests in which you participate;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

**Research and development.** We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services. As part of these activities, we may create aggregated, de-identified and/or anonymized data from personal information we collect. We make personal information into de-identified or anonymized data by removing information that makes the data personally identifiable to you. We may use this aggregated, de-identified or otherwise anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

**Marketing and advertising.** We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you Company-related or other direct marketing communications as permitted by law, including by email. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.
- **Interest-based advertising.** Our third-party advertising partners may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms.

**Service improvement and analytics.** We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**With your consent.** In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

## How we share your personal information

We may disclose your personal information to the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.

**Affiliates.** Our corporate parent, subsidiaries, and affiliates for purposes and use consistent with this Privacy Policy.

**Service providers.** Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, online chat functionality providers, email delivery, marketing, consumer research and website analytics).

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [Compliance and protection purposes](#) described above.

**Business transferees.** Acquirers and other relevant participants in business transactions (or negotiations

of or due diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, the Company or our affiliates (including, in connection with a bankruptcy or similar proceedings).

## Your choices

In this section, we describe the rights and choices available to all users. Users located in Europe can find information about their additional rights in the **Notice to users in Europe and other countries outside the US** section below and users who are California residents can find information about their additional rights in the **Notice to California residents** section below.

**Opt-out of communications.** You may opt-out of marketing-related emails and other direct marketing communications by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

**Cookies.** For information about cookies employed by the Service and how to control them, see our [Cookie Notice](#).

**Blocking images/clear gifs:** Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

**Do Not Track.** Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track”. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

## Other sites and services

The Service may contain links to third party websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions, nor are they subject to this Privacy Policy. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

**Google Maps.** Our Services may include Google Maps features and content. Google Maps features and content is subject to the then-current versions of Google Maps/Google Earth [Additional Terms of Service](#) and Google [Privacy Policy](#).

**YouTube.** Our services may contain videos and content provided by YouTube. YouTube content is subject to the then-current versions of Google’s [Privacy Policy](#) and you can adjust your privacy controls here: <https://www.youtube.com/howyoutubeworks/user-settings/privacy/>.

## Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

## International data transfer

We are an international company and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Users located in Europe or other countries outside the US should read the important information provided below about transfer of personal information outside of Europe.

## Children

The Service is not intended for use by anyone under 16 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

## Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledgment that the modified Privacy Policy applies to your interactions with the Service and our business.

## How to contact us

- **Email:** maxcessmarketing@gmail.com
- **Phone:** 1.405.755.1600
- **Mail:** [1211 W 22nd St #804, Oak Brook, IL 60523]

## Notice to California residents

This notice describes our collection, use and disclosure of personal information of California residents in our capacity as a "business" under the California Consumer Privacy Act ("**CCPA**") and their rights with respect to their personal information. For purposes of this notice, "personal information" has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA.

**Your privacy rights.** As a California resident, you have the following rights under the CCPA:

- **Right to know.** You can request information about the categories of personal information that we have collected; the categories of sources from which we collected personal information; the business or commercial purpose for collecting, sharing and/or selling personal information; the categories of any personal information that we sold or disclosed for a business purpose; and the categories of any third parties with whom personal information was sold, shared or disclosed for a business purpose.
- **Right to access.** You can request a copy of personal information that we have collected about you.
- **Right to deletion.** You can request that we delete personal information that we collected from you.

- **Right to opt-out.** If we “sell” or “share” your personal information as defined by the CCPA, you can opt-out of those disclosures.
- **Right to correction.** You can request that we correct inaccurate personal information that we have collected about you.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

**How to exercise your rights.** You may submit requests to exercise your right to information/know, access, appeal, correction, or deletion by using the [How to contact us section](#) above or at [Privacy Form | Maxcess \(maxcessintl.com\)](#). The rights described above are not absolute, and, in certain cases, we may decline your request as permitted by law or where the laws in your state do not afford you these rights. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. You can ask to appeal any denial of a request in the same manner through which you may submit one.

**Verification of identity; authorized agents.** We may need to verify your identity to process your information/know, access, deletion, and correction requests, and we reserve the right to confirm your residency. To verify your identity, we may require authentication into your Service account if you have one, provide personal identifiers we can match against information we may have collected from you previously, confirm your request using the email or telephone account stated in the request, provide government identification, or provide a declaration under penalty of perjury, where permitted by law. Furthermore, your authorized agent may make a request on your behalf. We will process your agent’s requests to exercise your rights to know, access, correction or deletion upon our verification of the agent’s identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to applicable state law, proof that you have given the agent permission to submit the request or additional information.

**Information practices.** The following describes our practices currently and during the past 12 months:

- **Sources and purposes.** We collect all categories of personal information from [the sources](#) and use them for the business/commercial [purposes](#) described above in the Privacy Policy.
- **Sharing and sales of personal information.**
  - **Sharing.** Our potential use of the [interest-based advertising](#) services described above may constitute “sharing” of your personal information (including identifiers and internet/network information described in the CCPA) with our advertising partners from which you have the right to opt-out. If we engage in such practices, you can request to opt-out of this sharing of your personal information by clicking the **[Do Not Sell or Share My Personal Information](#)** link in the footer of this webpage. Your request to opt-out will apply only to the browser and the device from which you submit the request.
  - **Sales.** We do not otherwise “sell” personal information as defined by the CCPA. Although our Services are not intended for children under 16 years of age, we are required to inform you that we do not have actual knowledge that we have sold or shared the personal information of children under 16.
- **Sensitive personal information.** We do not use or disclose sensitive personal information for purposes that California residents have a right to limit under the CCPA.
- **Deidentification.** We do not attempt to reidentify deidentified information derived from personal information, except for the purpose of testing whether our deidentification processes comply with applicable law.



- **Retention.** The criteria for deciding how long to retain personal information is generally based on whether such period is sufficient to fulfill the purposes for which we collected it as described in this notice, including complying with our legal obligations.
- **Collection and disclosure.** The chart below describes the personal information we collect by reference to the categories of personal information specified in the CCPA (Cal. Civ. Code §1798.140), and the categories of third parties to whom we disclose it. The terms in the chart refer to the categories of information and third parties described above in this Privacy Policy in more detail. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below. We may also disclose personal information to professional advisors, authorities and others, and business transferees as described above in the [How we share your personal information](#) section of this Privacy Policy.

Statutory category/personal information we collect (see “Personal information we collect” section above for details)	Categories of third parties to whom we disclose the personal information for a business purpose
<b><u>Identifiers</u></b> <ul style="list-style-type: none"> <li>• Contact data</li> <li>• Communications interaction data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> </ul>
<b><u>Identifiers (online)</u></b> <ul style="list-style-type: none"> <li>• Device data</li> <li>• Communication interaction data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> </ul>
<b><u>California Customer Records</u></b> (as defined in California Civil Code §1798.80) <ul style="list-style-type: none"> <li>• Contact data</li> <li>• Communication data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> </ul>
<b><u>Commercial Information</u></b> <ul style="list-style-type: none"> <li>• Contact data</li> <li>• Marketing data</li> <li>• Online activity data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> </ul>

<u><b>Internet or Network Information</b></u> <ul style="list-style-type: none"> <li>• Device data</li> <li>• Online activity data</li> <li>• Communication interaction data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> </ul>
<u><b>Professional or Employment Information</b></u> <ul style="list-style-type: none"> <li>• Company data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> </ul>
<u><b>Inferences</b></u> May be derived from: <ul style="list-style-type: none"> <li>• Contact data</li> <li>• Marketing data</li> <li>• Online activity data</li> <li>• Communication interaction data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> </ul>
<u><b>Protected Classification Characteristics</b></u> May be included or revealed in: <ul style="list-style-type: none"> <li>• Contact data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> </ul>

## Notice to users in Europe and other countries outside the US

### General

**Where this Notice to users in Europe and other countries outside the US applies.** The information provided in this “Notice to users in Europe and other countries outside the US” section applies only where (i) we are processing the personal information of individuals located in the EEA, the UK (EEA and UK jurisdictions are together referred to as “**Europe**”), or other country as a controller, and (ii) the laws related to the processing of personal information of such jurisdiction apply directly to us. For the avoidance of doubt, this section does not constitute our submission to the jurisdiction of any such laws around the world and this section only applies to the extent the data protection or data privacy laws of a particular jurisdiction outside of the United States apply directly to our processing of your personal information.

**Personal information.** References to “personal information” in this Privacy Policy should be understood to include a reference to “personal data” (as defined in the GDPR or applicable law) – i.e., information about individuals from which they are either directly identified or can be identified.

**Controller.** The Company is the controller in respect of the processing of your personal information covered by this Privacy Policy for purposes of European or other data protection legislation (i.e., the [EU GDPR](#) and the so-called ‘[UK GDPR](#)’ (as and where applicable, the “**GDPR**”)). See the [How to contact us section](#) above for our contact details.

### Our legal bases for processing

In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a “legal basis” for that use.

Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to process your personal information to deliver our Services to you (including our Site) (“**Contractual Necessity**”).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”). More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information for is set out in the table below.
- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the Purpose in question (“**Consent**”).

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your personal information – for more information on these Purposes and the data types involved, see [How we use your personal information](#) above.

Purpose	Categories of personal information involved	Legal basis
<b>Service delivery and operations</b>	<ul style="list-style-type: none"><li>• Contact data</li><li>• Account data</li><li>• Communications data</li></ul>	Contractual Necessity.
<b>Research and development</b>	<ul style="list-style-type: none"><li>• Any and all data types relevant in the circumstances</li></ul>	Legitimate interest. We have legitimate interest in understanding what may be of interest to our customers, improving customer relationships and experience, delivering relevant content to our customers, measuring and understanding the effectiveness of the content we serve to customers.
<b>Direct marketing</b>	<ul style="list-style-type: none"><li>• Contact data</li><li>• Communications data</li><li>• Marketing data</li></ul>	<p>Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organisation and sending marketing communications for that purpose.</p> <p>Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.</p>

Purpose	Categories of personal information involved	Legal basis
<b>Compliance and protection</b>	<ul style="list-style-type: none"> <li>Any and all data types relevant in the circumstances</li> </ul>	<p>Compliance with Law.</p> <p>Legitimate interest. Where Compliance with Law is not applicable, we and any relevant third parties have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety.</p>
<b>Further uses</b>	<ul style="list-style-type: none"> <li>Any and all data types relevant in the circumstances</li> </ul>	<p>The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the Personal Information was collected.</p> <p>Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.</p>

#### Retention

We retain personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for compliance and protection purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information, we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

#### Other information

**No obligation to provide personal information.** You do not have to provide personal information to us. However where we need to process your personal information either to comply with applicable law or to deliver our Services to you, and you fail to provide that personal information when requested, we may not be able to provide some or all of our Services to you. We will notify you if this is the case at the time.

**No sensitive personal information.** We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services, or otherwise to us. If you provide us with any sensitive personal information to us when you use the Services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive

personal information through our Services.

**No automated decision-making and profiling.** As part of the Services, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects. We will let you know if that changes by updating this Privacy Policy.

**Security.** We have put in place procedures designed to deal with breaches of personal information. In the event of such breaches, we have procedures in place to work with applicable regulators. In addition, in certain circumstances (including where we are legally required to do so), we may notify you of breaches affecting your personal information.

#### Your rights

**General.** Applicable data protection laws may give you certain rights regarding your personal information. If you are located in Europe or other countries outside the US where such rights apply, you may ask us to take any of the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no lawful reason for us continuing to store or process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons that will be notified to you, if applicable, at the time of your request.
- **Portability.** Port a machine-readable copy of your personal information to you or a third party of your choice, in certain circumstances. Note that this right only applies to automated information for which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Restrict.** Restrict the processing of your personal information, if, (i) you want us to establish the personal information's accuracy; (ii) where our use of the personal information is unlawful but you do not want us to erase it; (iii) where you need us to hold the personal information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your personal information but we need to verify whether we have overriding legitimate grounds to use.
- **Object.** Object to our processing of your personal information where we are relying on legitimate interests (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedom – you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time. This will not affect the lawfulness of any processing carried out before you withdraw your consent.

**Exercising These Rights.** You may submit these requests by using the [How to contact us section](#) above. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any

legal restrictions. Typically, you will not have to pay a fee to exercise your rights; however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We try to respond to all legitimate requests within a month. It may take us longer than a month if your request is particularly complex or if you have made a number of requests; in this case, we will notify you and keep you updated.

**Your Right to Lodge a Complaint with your Supervisory Authority.** In addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

- For users in the European Economic Area – the contact information for the data protection regulator in your place of residence can be found here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).
- For users in the UK – the contact information for the UK data protection regulator is below:  
The Information Commissioner's Office  
Water Lane, Wycliffe House  
Wilmslow - Cheshire SK9 5AF  
Tel. +44 303 123 1113  
Website: <https://ico.org.uk/make-a-complaint/>

#### Data Processing outside of your home country

We are an international company and many of our service providers, advisers, partners or other recipients of data are also based in the US and elsewhere around the world. This means that, if you use the Services, your personal information may be accessed and processed in the US or elsewhere around the world.

It is important to note that the recipient jurisdiction may not be subject to an 'adequacy decision' under applicable laws (e.g., GDPR) – basically, this means that the recipient jurisdiction's legal regime is not considered by relevant legal bodies to provide an adequate level of protection for personal information, which is equivalent to that provided by your home jurisdiction (e.g., Europe) laws.

Where we share your personal information with third parties who are based outside your home country, we try to ensure a similar degree of protection is afforded to it in accordance with applicable privacy laws by making sure one of the following mechanisms is implemented:

- **Transfers to territories with an adequacy decision.** We may transfer your personal information to countries or territories whose laws have been deemed to provide an adequate level of protection for personal information by the relevant legal authority (e.g., the European Commission or UK Government).
- **Transfers to territories without an adequacy decision.**
  - We may transfer your personal information to countries or territories whose laws have **not** been deemed to provide such an adequate level of protection (e.g., the US, see above).
  - However, in these cases:
    - we may use specific appropriate safeguards, which are designed to give personal information effectively the same protection it has in your home country – for example, standard-form contracts approved by relevant authorities for this purpose; or

- in limited circumstances, we may rely on an exception, or 'derogation', which permits us to transfer your personal information to such country despite the absence of an 'adequacy decision' or 'appropriate safeguards' – for example, reliance on your explicit consent to that transfer.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of your home country.