

Privacy Policy

Effective as of August 1st, 2022

Please click <u>here</u> to view the previous version of our Privacy Policy. For the purposes of this Privacy Policy, the terms "**you**," and "**your**," refer to the individuals about whom we collect personal information.

Metadata, Inc. ("**Metadata**," "**we**", "**us**" or "**our**") leverages artificial intelligence to offer services for business-to-business marketers to automate their paid business-to-business marketing and advertising campaigns. This Privacy Policy describes how Metadata handles personal information that we collect in the following circumstances:

- through our website <u>www.metadata.io</u> and any other digital properties that link to this Privacy Policy (the "Site");
- through the Metadata platform (the "**Metadata Platform**") where and to the extent we use your personal information for our own purposes (e.g., account creation);
- in connection with the development of our data augmentation and intelligence services (the "Offerings"); and
- through social media, our marketing activities, our live events and other activities described in this Privacy Policy, (collectively, the "Service(s)").

This Privacy Policy does not apply to:

- information that we process on behalf of our business customers while providing the Metadata Platform to them (e.g., where business customers provide customer relationship data to us for us to enrich using our Offerings). We use personal information we receive from our business customers solely on the instructions of our business customers, as governed by our agreements with those business customers. If you have concerns regarding personal information that we process on behalf of a business, please direct your concerns to that business. For more information on our relationship with our business customers, see Our business customers below; and/or
- information we obtain from third-party sources that does <u>not</u> constitute "personal information," "personally identifiable information," and/or "personal data" for the purposes of applicable law. The majority of data we receive from third-party sources in order to develop and enhance our Offerings does not constitute personal information, personally identifiable information, and/or personal data.

Our Services are designed for businesses and their representatives. We do not offer products or services for use by individuals for their personal, family or household purposes. Accordingly, we treat all personal

information we collect as pertaining to individuals in their capacities as business representatives and not their individual capacities.

Metadata may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information.

You can download a printable copy of this Privacy Policy here.

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Services or otherwise may include:

- **Contact data**, such as your first and last name, salutation, email address, billing and mailing addresses, professional title and company name, and phone number.
- **Professional information**, such as your work history, city, state, country of residence, postal code, age and links to your profiles on social networks.
- Account data, such as the username and password that you may set to establish an online account on the Services, biographical details, preferences, and any other information that you add to your account profile.
- **Communications** that we exchange with you, including when you contact us through the Services, social media, by phone or video platform or otherwise, and recordings of the same.

- **Transactional data**, such as information relating to or needed to complete your orders on or through the Services, including order numbers and transaction history.
- Marketing data, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Payment information** needed to complete transactions, including payment card information or bank account number.
- **Promotional information**, including information you share when you enter a competition, promotion or complete a survey. Please note that if you participate in a sweepstakes, contest or giveaway through the Service, we may ask you for your Contact Data to notify you if you win or not, to verify your identity and/or to send you prizes. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and contests are voluntary. We recommend that you read the rules and other relevant information for each sweepstakes and contest that you enter.
- **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 obtain personal information about you falling within one or more of the categories identified above from third-party sources and we may combine that information with other information we have about you. For example, we may obtain personal information about you from:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Private sources**, such as our business customers, data providers/data licensors, information services, social media platforms and other third-party platforms/services that may be used to log into, or may otherwise be integrated with or connected to, the Services, and other similar private 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 Services, our communications and other online services, such as:

- Device data, such as your computer's 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 or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Site, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Location data**, such as city, state, and country.



For more information concerning our automatic collection of data, please see our Cookies Policy.

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. We may use your personal information to:

- provide, operate and improve the Services and our business, including enhancing our Offerings to enable our business customers to target advertising to their own users and prospects;
- establish and maintain business customer profiles on the Services;
- enable security features of the Services, such as by remembering devices from which you have previously logged in;
- communicate with you about the Services, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Services and our communications; and
- provide support for the Services, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, such as to analyze and improve the Services and our business, including through the use of analytics. For example, we may use analytics in connection with the Services to understand user activity on the Services, such as which pages are most and least visited and how visitors move around the Services, as well as user interactions with our emails.

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 our business customers and prospects direct marketing communications. You may opt-out of our marketing communications as described in the <u>Opt-out</u> <u>of marketing</u> section below.
- Interest-based advertising. We and 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. You can learn more about your choices for limiting interest-based advertising in our

Cookies Policy.

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 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.

To create anonymous, aggregated or de-identified data. We may create anonymous, aggregated or deidentified data from your personal information and other individuals whose personal information we collect. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Service, develop new services and promote our business.

Data retention

Retention. We generally retain personal information to fulfill 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 fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as 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 may either delete it, anonymize it, or isolate it from further processing.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection.

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

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

Payment processors. Any payment card information you use to make a purchase on the Services is collected and processed directly by our payment processors.



Our business customers. We may enhance or supplement data we receive about you from a business customer with data we receive from other sources and provide the enhanced data back to such business customer. Our business customers may combine the personal information we share with other data they have and may process your personal information for their own purposes, including their own marketing and advertising purposes. This Privacy Policy does not apply to, and we are not responsible for, our business customers' (or any other third party's) processing of personal information. If you have questions concerning the processing of your information by one of our business customers, please contact the relevant business customer.

Advertising partners.

- We may provide information regarding our business customers and prospects to third-party advertising companies for the <u>interest-based advertising purposes</u> described above.
- We may also work with third-party advertising companies in connection with the provision of the Services to our business customers to enable our business customers to target advertising. As noted, this Privacy Policy does not apply to, and we are not responsible for, our business customers' or any third party's processing of personal information. See '<u>Our business customers</u>' above for more information.

Business and marketing partners. Third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Linked third-party services. If you log into the Services with, or otherwise link or connect your account to, a social media, customer relationship management or other third-party service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.

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 <u>compliance and protection purposes</u> 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, Metadata or our affiliates (including, in connection with a bankruptcy or similar proceedings).

With your consent. We may share your personal information with any third parties where you have consented to such sharing.

Your choices

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.



Opt-out of marketing communications. You may opt-out of marketing-related emails from us by following the opt-out or unsubscribe instructions at the bottom of the email, or by <u>contacting us</u>. 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. You may have the right to opt-out of receiving marketing or

advertising calls, in which case you may do so during any such call or by contacting us.

Cookies. For information about cookies and other tracking technologies employed by the Services and how to control them, including your choices with respect to interest-based advertising, see our <u>Cookies</u> <u>Policy</u>.

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.

Linked third-party platforms. If you choose to connect to the Services through, or link or otherwise connect the Services with, your social media account, customer relationship management platform or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

Delete your content or close your account. You can choose to delete certain content through your account. If you wish to request to close your account, please <u>contact us.</u>

Residents of Nevada and Vermont. Certain data sharing we engage in may be classified under Nevada and Vermont law as a "sale" of your Personal Information. If you are a resident of Nevada or Vermont, you can request to opt-out out of the sale of covered personal information <u>here</u>:

Other sites and services

The Services may contain links to 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. 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 headquartered in the United States 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.

For more information on how we transfer personal information from the European Economic Area, United Kingdom and Switzerland, please see our <u>European Notice</u>.

Children

The Services are not intended for use by anyone under 18 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 Services 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 acceptance of the modified Privacy Policy.

How to contact us

- Email: privacy@metadata.io
- Mail: Metadata, Inc., 1754 Technology Drive, STE 212, San Jose, California, 95110, United States
- Phone: 415-231-2211



California Privacy Rights Notice

This section describes how we collect, use, and share Personal Information of California residents in our capacity as a "business" under the California Consumer Privacy Act ("**CCPA**") and their rights with respect to that Personal Information. For purposes of this section, the term "**Personal Information**" has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA. In some cases, we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section.

Your California privacy rights. California residents have the rights listed below under the CCPA with respect to their Personal Information. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- Information. You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.
 - \circ The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with which we share Personal Information.
 - The categories of Personal Information that we sold or disclosed for a business purpose.
 - The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- Access. You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- Opt-out of sales. You can opt-out of any sale of your Personal Information.
- **Opt-in.** As the Services are intended for users 18 years of age or older, we do not intentionally collect or sell Personal Information regarding individuals between the ages of 13 and 15.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

Exercising your right to information, access and deletion. You may submit requests to exercise your right to information, access or deletion at https://metadata.io/data-request-form/, calling us at [415.231.2211], or via email to privacy@metadata.io.

Notice of right to opt-out of the "sale" of your Personal Information. Certain data sharing we engage in may be classified under California law as a "sale" of your Personal Information. You can request to opt-out out of this "sale" of your personal information here: <u>Do Not Sell My Personal Information.</u>

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

We will need to verify your identity to process your information, access and deletion requests and reserve the right to confirm your California residency. To verify your identity, we may require government identification, a declaration under penalty of perjury or other information.

Your authorized agent may make a request on your behalf 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 California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with confirmation that you have given the authorized agent permission to submit the request.

Financial Incentives. We may offer financial incentives as permitted by the CCPA. These incentives may result in different prices, rates, levels or quality of services. The terms and conditions of any such financial incentive shall be provided separately to you at the time of the offering.

Personal information that we collect, use and disclose. The chart below summarizes the Personal Information we collect by reference to the categories of Personal Information specified in the CCPA (Cal. Civ. Code §1798.140) and describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. The terms in the chart refer to the categories of information, sources, purposes 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. In addition to the disclosures described in the chart below, we disclose Personal Information as described in the <u>How we share your personal information</u> section above.

Statutory category / Personal information we collect in this category	Source of PI	Business/ commercial purpose for collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" PI
Identifiers Contact data Professional information Device data	 Third-party sources Automatic data collection 	 Service delivery Research and development Compliance and protection With your consent To create anonymous, aggregated or de- identified data 	 Affiliates Service providers Customers Advertising partners Business and marketing partners Linked third- party services Professional advisors Authorities and others Business transferees 	• Customers

			• With your	
			consent	
Inferences	N/A	• Service	 Affiliates 	Customers
		delivery	• Service	
May be derived from:		• Research and	providers	
		development	• Customers	
 Contact data 		 Marketing 	 Advertising 	
 Professional information 		and	partners	
 Communications 		advertising	 Business and 	
 Transactional data 		• Compliance	marketing	
 Marketing data 		and	partners	
 Promotional information 		protection	 Authorities 	
 Device data 		• With your	and others	
 Online activity data 		consent	• Business	
		• To create	transferees	
		anonymous,	• With your	
		aggregated	consent	
		or de-		
		identified		
		data		
Internet or other electronic	• Automatic	• Service	 Affiliates 	Customers
network activity	data	delivery	• Service	
<u>information</u>	collection	• Research and	providers	
	 Third-party 	development	 Customers 	
 Marketing data 	sources	• Compliance	 Authorities 	
 Device data 		and	and others	
 Online activity data 		protection	 Business 	
 Location data 		• With your	transferees	
		consent	• With your	
		• To create	consent	
		anonymous,		
		aggregated		
		or de-		
		identified		
		data		
Geolocation data	Automatic	• Service	 Affiliates 	Customers
	data	delivery	• Service	
 Location data 	collection	• Research and	providers	
	 Third-party 	development	 Customers 	
	sources		 Advertising 	
			partners	

Professional or Employment Information • Professional information	• Third-party sources	 Marketing and advertising Compliance and protection With your consent To create anonymous, aggregated or de- identified data Service delivery Research and development Compliance and protection With your consent 	 Business and marketing partners Linked third- party services Authorities and others Business transferees With your consent Affiliates Service providers Customers Linked third- party services Authorities and others 	• Customers
• Professional information		 Compliance and protection 	 Linked third- party services 	
		consent • To create anonymous, aggregated or de- identified	and others • Business transferees • With your consent	
		data		



Annual Consumer Requests Reporting

Below are statistics related to the number of data requests we received under the CCPA in the year prior to the effective date of this Privacy Policy.

	Requests to know	Requests to delete	Requests to opt-out of sale
Number of requests received	1	3	3
Number of requests complied with in full	1	3	3
Number of requests complied with in part	0	0	0
Number of requests denied	0	0	0
Mean number of days to substantively respond to requests	30	30	30

Updated August 1st, 2022



European Notice

The information provided in this European Notice section applies only to individuals in the United Kingdom ("**UK**"), Switzerland, and the European Economic Area ("**EEA**") (hereafter collectively referred to as "**Europe**").

Personal information. References to "personal information" in this Privacy Policy are equivalent to "personal data" governed by European data protection legislation, including the "**GDPR**" (i.e., the General Data Protection Regulation 2016/679 ("**EU GDPR**") and the EU GDPR as it forms part of UK law ("**UK GDPR**")). Under the GDPR, personal data is information about an individual, from which that individual is either directly identified or can be identified. It does not include 'anonymous data' (i.e., information where the identity of the relevant individual has been permanently removed and that individual is no longer identified or identifiable).

Controller. Metadata, Inc. is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation.

Our GDPR Representatives. For users in the EEA or UK, our representatives appointed under the EU GDPR and UK GDPR respectively are:

EU representative: VeraSafe Ireland Ltd.	UK representative: VeraSafe UK Ltd.
Inquiries:	Inquiries:
https://verasafe.com/public-resources/contact-	https://verasafe.com/public-resources/contact-
data-protection-representative	data-protection-representative
Via telephone at: +420 228 881 031.	Via telephone at: +44 (20) 4532 2003

Legal bases for processing. We use your personal information for the purposes listed below. In respect of each of the purposes for which we use your personal information, European data protection legislation 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 perform a contract, we are about to enter into or have entered into with you ("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 the legal bases we rely on in respect of the relevant purposes for which we use your personal information (see <u>How we use your personal information</u>).

Processing purpose	Categories of personal information involved	Legal basis
Service delivery	Contact data	Contractual Necessity
	Professional information	Legitimate Interests
	Account data	Consent
	Communications	
	Transactional data	
	Payment information	
	Device data	
	Online activity data	
Research and	Contact data	Contractual Necessity
developmentMarketing and	Professional information	Legitimate Interests
advertising purposes	Account data	Consent
• Compliance and	Communications	
protection purposesSharing your personal	Transactional data	
information as described	Payment information	
in this Privacy Policy	Marketing data	
	Promotional information	
	Device data	
	Online activity data	
To comply with applicable law	Any data relevant to comply with applicable law	Compliance with Law
With your consent	Any data for which we are required to obtain consent by applicable law	Consent

Use for new purposes. We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

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.

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.

Your rights. European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take 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.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.
- **Opt-out.** Stop sending you direct marketing communications. You may continue to receive service-related and other non-marketing emails.
- **Consent withdrawal.** Where we rely on your consent and/or explicit consent to process your personal information you may withdraw that consent at any time.



You may submit these requests by email to <u>privacy@metadata.io</u> or our postal address provided under <u>How to contact us</u>. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator <u>here</u>.

Cross-border data transfer. We may share your personal information with third parties who are based outside Europe. In such circumstances, those parties' processing of your personal information will involve a transfer your personal information outside of Europe.

We endeavour to ensure that people to whom we provide your personal information hold it subject to the standards required by European data protection legislation. So, whenever we transfer your personal information out of Europe, we try to ensure a similar degree of protection is afforded to it by making sure at least 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 data by the European Commission or UK Government (as and where applicable) from time to time.
- Transfers to territories without an adequacy decision.
 - We may transfer your personal information to countries or territories whose laws have <u>not</u> been deemed to provide an adequate level of protection for Personal Data by the European Commission or UK Government (as and where applicable).
 - What this means is that the relevant authority(ies) have not adopted an 'adequacy decision' to confirm that the relevant laws and practices in that country or territory are sufficient to ensure an adequate level of protection for personal data to the standards required by the GDPR for example, there is currently no such decision in respect of the United States.
 - However, in these cases:
 - we may use specific appropriate safeguards approved by the European Commission, the UK Information Commissioner's Office or UK Government (as and where applicable), which are designed to give personal information the same protection it has in Europe – for example, requiring the recipient of personal information to enter into the relevant form of the so-called 'Standard Contractual Clauses' issued or approved from time to time; or
 - in limited circumstances, we may rely on an exception, or 'derogation', which permits us to transfer your 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 using the details under <u>How to contact us</u> if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.