

## Privacy Policy

This Privacy Policy describes how Comprehensive, Inc. (“**Comprehensive**,” “**we**,” “**us**,” “**our**”) collects, uses, shares, and protects information about you that is captured when you use our sites and applications or interact with us, whether through our website (our “**Site**”), our cloud-based compensation management platform, or through links that we make available on third party sites or platforms. (collectively, our “**Services**”). This Privacy Policy also explains your choices regarding your information. We follow this Privacy Policy in accordance with applicable law.

BY USING OUR SERVICES OR CHOOSING TO SUBMIT PERSONAL DATA TO US THROUGH THE SERVICES OR CLICKING A BUTTON OR CHECKING A BOX MARKED “I AGREE”, “SIGN UP”, “JOIN NOW” (OR SOMETHING SIMILAR), YOU SIGNIFY THAT YOU HAVE READ, UNDERSTOOD, AND AGREE TO THE TERMS OF THIS PRIVACY POLICY.

### CANADIAN RIGHTS

If you are located in Canada, [YOUR CANADIAN PRIVACY RIGHTS](#) provides additional information regarding your data privacy rights under Canadian law.

### EUROPEAN RIGHTS

If you are located in the European Union (“**EU**”), a European Economic Area (“**EEA**”) member state, or the United Kingdom (“**UK**”), or the processing of your personal data may have actual or potential effects in Switzerland, [YOUR EUROPEAN PRIVACY RIGHTS](#) provides additional information regarding your data privacy rights under EU, EEA, UK, and Swiss law, as applicable.

### WHAT INFORMATION WE COLLECT

For purposes of this Policy, “**personal data**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. It does not include “**anonymized data**” (meaning information that doesn’t directly or indirectly, and can’t reasonably be used to, identify a specific individual), “**pseudonymized data**” (information that can’t be used to identify an individual without the use of additional information), or “**aggregate data**” (meaning information about groups of people that doesn’t identify and can’t reasonably be used to identify individuals), or public information lawfully available from governmental records. When anonymized data or pseudonymized data is directly or indirectly associated with personal data, we treat it as personal data.

We collect:

- **Personal Identifiers:** Information you provide when you create an account with us, enter a promotion, sign up to receive information from us, participate in a survey, answer a questionnaire, or that your employer provides to us, either directly or through its service provider, such as:
  - your first and last name, work email address
  - your username, password, password hints, and other information used to authenticate you and allow you to access your account
  - your gender and/or race
- **Electronic Activity Information:** Information about your use of our Services and advertisements and the Internet, such as:

- browser, platform, or device type, unique device identifier, operating system, IP address, software and hardware attributes, your internet service provider’s domain name
- content viewed or downloaded, landing pages, how often you use the Services, browsing activity, dates and times of access, forms you complete or partially complete, error logs, whether you open an email, search terms
- **Employment Information:** Information about your employment, such as: job title, job level, department, manager, compensation data, performance ratings, location
- Information we **obtain from third parties**, such as our clients and service providers, or third parties from whom we purchase information about our users or potential users
- **Inferences** drawn from any of the personal data described above.

## HOW WE COLLECT INFORMATION

We collect information from or about you when you use or access the Services, request information from us or participate in surveys, questionnaires, or promotions. You may provide information to us by typing, voice commands, or uploading images, video, or other content to our Services. We also obtain information about you from third parties. We protect this information according to this Privacy Policy and any additional restrictions required by the party who has provided us with that information. Applicable law or your agreement with the third party may require that you authorize the third party to share your information with us before we can acquire it. These third party sources vary over time and include:

- your employer
- your employer’s service providers, such as its payroll or HRIS provider
- our service providers
- data brokers from which we purchase data to supplement the data we collect

We, along with our service providers and other third parties from whom we acquire information, also automatically collect information through cookies, web beacons, tags, pixels, analytics tools, and other technologies, whether or not you are logged in or registered on any of our Services. Please see [COOKIES AND OTHER TRACKING TECHNOLOGY](#) and [OPT OUT PREFERENCE SIGNALS](#) for more information on how to make choices with respect to this kind of data collection.

## COOKIES AND OTHER TRACKING TECHNOLOGY

We and our service providers may use cookies and other online tracking technologies (“**tracking technologies**”) to collect information about your activities on our Services or on your devices. We may collect this tracking data whether or not you are logged in or have registered for an account on our Services and, if you have provided us with your personal data (such as by registering for an account on our Services), we may associate this tracking data with your personal data, in which case we will treat that tracking data as your personal data.

Advertisers and other third parties may also collect tracking data on third party sites and applications and from your devices and applications. This tracking data may be used to decide which ads you see on third-party sites and applications.

The data collected by these tracking technologies is used to:

- personalize the Services for you, such as to remember who you are when you return to the Services or to provide content and promotions based on your preferences, location, and use of our Services
- analyze the use of our Services, including user traffic
- improve and optimize our Services
- decide what ads you see on third party sites and applications

These tracking technologies include:

- **Cookies.** Cookies are small text files that are stored on your computer when you visit a website or use a mobile application. Cookies may transmit information from us to you or from you to us or to another party. Persistent cookies remain on the device of the person who accesses the Services after their browser has been closed. Session cookies exist only during an online session and disappear from the device when the browser software is closed.
  - *Essential Cookies:* These cookies are necessary for the Services to function properly and cannot be switched off in our systems. This category includes cookies that ensure the Services' basic functionality and security. These cookies do not store personal data.
  - *Non-Essential Cookies:* These cookies are not necessary for the Services to function. They may be used to help improve your experience of the Services, for analytics purposes, or to generally improve our users' online experience.

Most web browsers automatically accept cookies but provide controls that allow you to block or delete them. Check your web browser's instructions for how to block or delete cookies. Be aware that if you chose to block cookies, some features of the Services may not work. If you choose to delete cookies, it will also delete the settings controlled by those cookies (such as advertising preferences) and you will need to re-enter those settings. Please see [www.allaboutcookies.org](http://www.allaboutcookies.org) for additional information about cookies.

- **Other Technologies.** We may also use other technologies to collect information about you. These technologies help us track use of our Services and the effectiveness of our communications and promotional activities. For example, web beacons are small images embedded into websites or emails that send information about your device, such as when you access or use the Services or when you open an email we send you or access an ads we place on other parties' sites and applications.

## TARGETED ADVERTISING AND ANALYTICS

We use service providers to provide marketing analytics and we participate in ad networks. These service providers may place their own tracking technologies on your devices. These third-party tracking technologies collect information about your device and online activities over time and across different websites and applications services in order to provide you with relevant ads on our Services and other parties' websites and online services. Ad networks may share this information with the advertisers using their network. We prohibit these types of service providers from collecting or accessing information on our Services that directly identifies you (such as your name or email address).

[We may provide social media and other platforms with limited personal information, such as certain identifiers or your hashed email address, which they match with their customers' profiles. Based on this, the

platform may show you our ads, look for other users who may enjoy our ads, suppress our ads for you, and provide us insights on how to optimize and better target our advertising.]

To learn how to opt out of ad network interest-based advertising in the United States, please visit the Digital Advertising Alliance’s website [YourAdChoices](#) and the Network Advertising Initiative’s website [Opt Out of Interest-Based Advertising](#).

Even if you disable tracking, you may still receive targeted advertising due to information about you that had previously been disclosed to third parties and you may still receive advertising from third parties, though such advertising may not be based on your interests and preferences.

We use the following third party analytics providers, some of which allow you to opt-out of data collection or use:

- **Google Analytics.** See <https://tools.google.com/dlpage/gaoptout-to-opt-out>
- **Heap.** See <https://www.heap.io/privacy#california-notice>
- **Datadog.** See <https://www.datadoghq.com/privacy/>
- **RB2B.** See <https://app.retention.com/optout>. If you are located outside the U.S., see <https://www.rb2b.com/rb2b-gdpr-opt-out>

## OPT OUT PREFERENCE SIGNALS

Some browsers allow you to enable a universal tool that automatically communicates your opt-out preferences, such as the [Global Privacy Control](#). We will process such signals as a request to opt out.

## HOW WE USE COLLECTED PERSONAL DATA

Subject to applicable law and the choices and controls on the use of your personal data that may be available to you, we may use the personal data that we collect from and about you or the devices associated with you for any of the following purposes:

- **Services Provision.** To provide the Services to you; to improve, troubleshoot, debug, and repair the Services; to provide customer support. We may also share information with third parties when it is required to do any of the foregoing
- **Authentication.** To authenticate your profile information and that the person accessing or using your account is you
- **Communication.** To communicate with you, including to respond to your inquiries; to send you important information regarding our Services, changes to our terms, conditions, and policies, or other administrative information; to request feedback or completion of a survey or questionnaire
- **Personalization.** To personalize and enrich your experience on our Services; to facilitate your interactions with us; to track and categorize your activity and interests on the Services. Please see [\[link to “Your Privacy Choices” and “Cookies and Other Online Tracking Technologies” sections of this Privacy Policy\]](#) for more information
- **Marketing and Advertising.** To advertise and market to you, including sending you promotional communications, customizing the marketing and advertising that we show you, and presenting you with relevant offers; we may also run advertising on other websites and applications through our advertising display partners or our partnerships with retailers and other organizations. Please see YOUR PRIVACY

CHOICES AND RIGHTS and COOKIES AND OTHER TRACKING TECHNOLOGY for more information

- **Analytics.** To operate, develop, analyze, and improve the Services, including through surveys and other user research and analytics tools
- **Our Business Purposes.** For our business purposes, such as to meet our contractual and legal obligations, identify usage trends, further brand relationships, determine the effectiveness of our promotional campaigns, operate and improve on our lawful business activities, and detect and prevent misuse of our products and services and activities that may violate our policies, pose safety issues, or be fraudulent or illegal
- **Legal and Safety Purposes.** For legal and safety purposes, including to defend or protect us, you, or others from harm or in legal proceedings, protect our rights, protect our security and the security of our systems and customers, respond to court orders, lawsuits, subpoenas, and government requests, address legal and regulatory compliance, comply with our license obligations, enforce our Terms of Use, or notify you of product recalls or safety issues
- **Anonymized Data, Pseudonymized Data, and Aggregate Data.** To collect, process, and create anonymized data, pseudonymized data, and aggregate data, whether ourselves or through a service provider or other third party; to use and allow any party to use such data for any purpose. Once data is anonymized, we will not reidentify it with an identifiable individual. With respect to pseudonymized data, we keep separately any information necessary to identify you and implement effective technical and organizational controls that prevent us or any other party from accessing such additional information. We also require any third party to whom we disclose the pseudonymized data to do the same
- **Other Reasons With Your Consent.** For any purpose for which you provide your consent to us or request that we process your information

## SHARING YOUR INFORMATION WITH OTHER PARTIES

We will not disclose your personal data to third parties, other than as described below or as permitted or required by applicable law. All of our disclosure of your personal data will also be subject to applicable law. The third parties with whom and the purposes for which we may share your personal data include:

- **Our Service Providers.** When companies perform services on our behalf, such as fulfilling transactions, monitoring compliance with and enforcing our Terms of Use, auditing interactions and transactions with users, detecting and preventing fraud, addressing security issues, fixing errors, helping us with advertising and marketing, maintaining accounts, providing customer service, helping with our internal research and development, verifying product and service quality or safety, and performing any of the other actions or activities allowed under this Privacy Policy. These companies must comply with our data privacy and security requirements and may not use your personal data for purposes other than those we request or as required or permitted by law
- **Our Clients.** When we are performing services for your employer and collecting your personal data on their behalf. In this circumstance, your employer's privacy policy and agreements with you regarding the use of your personal data will apply and not this Privacy Policy. We will comply with your employer's instructions and the data privacy and security requirements in the agreement between us and that client. Applicable law or your agreement with your employer may also require that you authorize your employer to allow us to share your information with it before we do so

- **At Your Direction.** Please note that once we share your personal data with another party at your direction, the information received by the other party is controlled by that party and becomes subject to that party’s privacy practices, not this Privacy Policy. Please see [YOUR PRIVACY CHOICES AND RIGHTS](#)
- **Change of Control.** As part of a corporate transaction, such as a merger or sale of assets, divestiture, joint venture, securities offering, financing, bankruptcy, reorganization, liquidation, or dissolution. In such event, your information can be used subsequently by the other party or parties involved in that business transaction
- **Analytics.** For analytics, including to understand how you use the Services, determine how you access the Services, and improve the Services
- **Compliance With Law.** To comply with legal processes or applicable law, to enforce or apply our Terms of Use, to ensure the safety and security of us, our users, and third parties, to protect our rights and property and those of our users and third parties, and in other cases where we have a good faith belief that disclosure is required by applicable law
- **Anonymized, Pseudonymized, and Aggregate data.** We can disclose anonymized data, pseudonymized data, and aggregate data to any party for any purpose. Our agreements with third parties require that they not attempt to reidentify anonymized data or pseudonymized data with an identifiable individual.
- **Other Reasons With Your Consent.** For any other purpose for which you provide your consent to us or request that we process your information

You can choose not to disclose certain information. Please see [YOUR PRIVACY CHOICES AND RIGHTS](#).

## **YOUR PRIVACY CHOICES AND RIGHTS**

You have choices as to the information you share with us. When you are asked to provide personal data, you can say “no”. However, some of the features of our Services require certain personal data from you in order to operate. If you choose not to provide that information, you will be unable to use those features or they may not be personalized to you. If applicable law requires us to collect certain personal data from you or we need it in order to be able to enter into an agreement with you or perform an agreement with you and you don’t provide that personal data, we will not be able to enter into that agreement or may need to suspend or cancel the Service that is affected by you not providing that information. We will notify you if this is the case at that time.

Certain jurisdictions outside the United States have provided their residents with certain rights with respect to their personal data. If you are located in Canada, [YOUR CANADIAN PRIVACY RIGHTS](#) provides additional information regarding your data privacy rights under Canadian law. If you are located in the European Union (“EU”), a European Economic Area (“EEA”) member state, or the United Kingdom (“UK”), or the processing of your personal data may have actual or potential effects in Switzerland, [YOUR EUROPEAN PRIVACY RIGHTS](#) provides additional information regarding your data privacy rights under EU, EEA, UK, and Swiss law. If you are a resident of another country, that country may provide you with similar rights; however, not all jurisdictions provide their residents with the same rights and the scope of rights provided may vary somewhat from country to country. You can find information about whether or not your jurisdiction offers you data privacy rights by conducting an Internet search.

## **HOW TO SUBMIT A REQUEST REGARDING YOUR PERSONAL DATA**

We will respond to all requests to control your personal data within 30 days after the date on which we receive your request or as required by applicable law. If we require additional information or time to process your request, we will contact you. In some circumstances, your ability to access or control your personal data will be limited, as required or permitted by applicable law.

If you have questions about the specific personal data about you that we process or retain or your rights regarding that personal data, please contact us by one of the following methods:

- You may email us at [support@comprehensive.io](mailto:support@comprehensive.io)
- You may write to us at:

Customer Support  
Comprehensive, Inc.  
548 Market St., #69060  
San Francisco, CA 94104  
USA

With respect to personal data that you have provided to us, if you wish to opt-out of our use of that personal data, make corrections to that personal data, or request that we delete that personal data, please contact us using one of the methods above.

With respect to your personal data that has been provided to us by or on behalf of your employer, please contact your employer's administrator (typically your employer's HR department), if you wish to opt-out of our use of that personal data, make corrections to that personal data, or request that we delete that personal data.

To respond to a request, we are required to verify your identity. You will be required to provide the primary email address listed on your account. A verification email will then be sent to that email address in order to verify your identity. We may need to contact you to confirm your request.

We will respond to your requests based on the data privacy laws of your jurisdiction that apply to us as of the effective date of those laws. If we do not act on your request (such as, because there is an exception under applicable law or we cannot verify your identity), we will explain our reasons why. You may appeal our decision on your request by contact us using one of the above methods.

## **RETENTION OF YOUR PERSONAL DATA**

We will retain your personal data for as long as reasonably necessary for the purposes outlined in this Privacy Policy, while we have a legitimate business need to do so in connection with your user account (if you have one), or as required by law (for example, for legal, tax, or accounting purposes), whichever is longer.

If you have elected to receive email communications from us, we retain information about your email preferences until you opt out of receiving our email communications from us and in accordance with our policies.

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

## **SECURITY**

We use a variety of technologies and processes to protect personal data collected on the Services from accidental or unlawful destruction, loss, or alteration, and from unauthorized access, use, or disclosure, including physical, technological, and organizational security measures. For example, we use encryption technology whenever transmitting personal data. Unfortunately, no security technology is completely secure. Email and other communications, including those sent through or in connection with the Services, may not be secure. You should

use caution whenever submitting information through or in connection with the Services and take special care in deciding which information you provide to us.

## **STORAGE**

Some or all of the personal data we collect may be stored or processed on servers located outside of your country, including in the United States, whose data protection laws may differ from those where you live. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions. Subject to applicable laws in such other jurisdictions, we will use reasonable efforts to ensure that appropriate security processes are in place to maintain protection over the personal data we collect.

## **THIRD PARTY WEBSITES**

When you provide information to us on a third-party site or platform, such as through an advertisement about us that appears there, or click on a link to a third-party site or platform that appears on our Services, the information you provide may be separately collected by that third-party site or platform. Our Services may also contain links to other sites or platforms not owned or controlled by us and we are not responsible for the privacy practices of those sites or platforms. The information we collect is covered by this Privacy Policy and the information the third-party site or platform collects is covered by that third-party site or platform's privacy policy. Privacy choices you make on the third-party site or platform will not apply to our use of information we have collected directly through our Services. Be aware when you leave our Services and be sure to read the privacy policies of other sites or platforms that may collect your information.

## **CHILDREN'S PRIVACY**

Our Services are not intended for use by children. Children under the age of 18 are prohibited from creating an online profile. If you have reason to believe that we may have accidentally received personal data from an individual under age 18 without such consent, please immediately email us at [support@comprehensive.io](mailto:support@comprehensive.io).

## **PRIVACY POLICY CHANGES**

If our Privacy Policy changes, we will post these changes to our Services with the date of revision. Unless otherwise stated, any modifications to this Privacy Policy will go into immediate effect after they have been posted. We encourage you to review our Privacy Policy periodically. Your continued access to and/or use of the Services after any such changes constitutes your acceptance of, and agreement to be legally bound by, this Privacy Policy, as revised. If our privacy practices, including the ways we use your personal data, materially change from the time you created an online profile, we will notify you about such changes before they take effect and allow you to delete your information as described above, should you disagree with such changes.

## **CONFLICTS**

If any of the terms of this Privacy Policy conflict with any of the terms of our Terms of Use, the terms of this Privacy Policy shall control with respect to the subject matter of this Privacy Policy.

## **CONTACT US**

If you have any questions about this Privacy Policy, please contact us by one of the following methods:

- You may email us at [support@comprehensive.io](mailto:support@comprehensive.io)
- You may write to us at:

Customer Support  
Comprehensive, Inc.  
548 Market St., #69060  
San Francisco, CA 94104  
USA

## **YOUR CANADIAN PRIVACY RIGHTS**

Canada provides its residents with the following data privacy rights. Exercise of some of these rights may involve a minimal charge:

- **right to know** whether we are processing your personal data, where we obtained it, and how we are using it
- **right to access** that personal data
- **right to correct** inaccurate personal data that we have maintained about you, taking into account the nature of the personal data and the purposes of the processing
- **right to delete** personal data that we have collected about you
- **right to data portability** you have the right to ask that we transfer the personal data you gave us from one organization to another, or give it to you
- **right to withdraw consent** to our use of your personal data

Please note that these rights are not absolute and certain exemptions may apply to specific requests that you may submit to us.

## **HOW TO SUBMIT A REQUEST**

You may submit a request to exercise your privacy rights or appeal our decision on your request by any of the following methods:

- You may email us at [support@comprehensive.io](mailto:support@comprehensive.io)
- You may write to us at:  
Customer Support  
Comprehensive, Inc.  
548 Market St., #69060  
San Francisco, CA 94104

To submit a request, we are required to verify your identity. You will be required to provide the primary email address listed on your account. A verification email will then be sent to that email address in order to verify your identity. We may need to contact you to confirm your request.

You may use an authorized agent to submit your request. If you are an authorized agent and a consumer has given you written, signed permission to submit a request on their behalf, you must submit a copy of that permission to us in order to submit the consumer's request. We will require the consumer to verify their identity and directly confirm with us that they have provided you with permission to submit the request. You may submit such requests through the methods set forth directly above.

If we refuse your request, we will provide you with the reason for the refusal.

## CROSS-BORDER TRANSFERS OF PERSONAL DATA

Personal data that you provide while in Canada will be transferred to the United States and may be transferred to other countries. The laws in these other jurisdictions may not be as protective of your privacy as those in Canada and your personal data may be accessible to law enforcement and national security authorities of those jurisdictions. If we transfer personal data from Canada, we will comply with PIPEDA's Fair Information Principles and any other applicable Canadian laws with respect to the personal data transferred.

## YOUR EUROPEAN PRIVACY RIGHTS

This section of our Privacy Policy provides certain required information to persons located in the European Union ("EU"), a European Economic Area ("EEA") member state, or the United Kingdom ("UK"), and to persons with respect to whom the processing of their personal data may have actual or potential effects in Switzerland (collectively, "Europe"). Before we collect any personal data, you are entitled under the General Data Protection Regulation ("GDPR"), all laws relating to data protection, the Processing of Personal Data, privacy and/or electronic communications in force from time to time in the UK, including the UK GDPR (as defined in section 3 of the Data Protection Act 2018) and the Data Protection Act 2018, as amended ("UK-GDPR") and the revised Swiss Federal Act on Data Protection ("revFADP") to the information in this Privacy Policy.

## LEGAL BASES FOR PROCESSING PERSONAL DATA

With respect to individuals located in Europe, we will only process your personal data when we have a lawful basis for doing so. The table below describes the legal bases for our processing of your personal data under European data protection laws. See HOW WE USE COLLECTED PERSONAL DATA for a more detailed description of the purpose for which we process personal data. We may also seek your prior consent or rely on some other lawful basis to process your personal data.

Purpose	Legitimate Interests
Services Provision	Developing, operating, monitoring and securing our Services and business operations generally
Authentication	Securing your account and our Services and business operations generally
Communication	The establishment, development, maintenance and management of our commercial relationships; and enabling the effective provision and use of our Services
Personalization	Developing, operating, and monitoring our Services, enabling the effective provision and use of our Services
Marketing and Advertising	Keeping our customers and potential customers informed about our products and services.
Analytics	Developing, operating, monitoring and securing our Services and business operations generally
Our Business Purposes	Developing, operating, monitoring and securing our Services and business operations generally, the management, administration, development and transformation of our business

<b>Purpose</b>	<b>Legitimate Interests</b>
Legal and Safety Purposes	Ensuring the security of network and information systems, the protection of our Services and organization, the protection of others, the protection and assertion of legal rights, compliance with legal and contractual obligations
Anonymized Data, Pseudonymized Data, Aggregate Data.	Developing and improving our Services and business operations generally
Other Reasons With Your Consent	You have expressly consented to the use

## **RIGHTS OF INDIVIDUALS LOCATED IN EUROPE**

If you are located in Europe, or the processing of your personal data may have actual or potential effects in Switzerland, the laws in your jurisdiction grant you certain rights with respect to your personal data. A list of these rights is below. Please note that these rights are not absolute and certain exemptions may apply to specific requests that you may submit to us.

<b>Right</b>	<b>What you can do</b>
<b>Know</b>	You have the right to know why we are processing your personal data, how it will be used, with whom it will be shared
<b>Access</b>	You have the right to ask us for copies of your personal data. When making a request, please provide an accurate description of the personal data to which you want access. We may charge a reasonable fee based on administrative cost
<b>Rectification</b>	You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
<b>Erasure</b>	You have the right to ask us to erase your personal data in certain circumstances and as required by applicable law
<b>Object to Processing</b>	You have the right to object to the processing of your personal data based on legitimate interests. If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests or which override your rights and freedoms, or we can demonstrate the processing is for the establishment, exercise, or defence of legal claims.
<b>Restrict Processing</b>	You have the right to ask us to restrict the processing of your personal data in certain circumstances, including: (i) when the accuracy of the personal data is brought into question or (ii) when we no longer need the personal data for the purposes of the processing but you require use to retain such personal data and restrict its processing in connection with the establishment, exercise, or defence of a legal claim with which you are involved
<b>Data Portability</b>	You have the right to ask that we transfer the personal data you gave us from one organization to another, or give it to you
<b>Complain to a Supervisory Authority</b>	You have the right to complain about our processing of your personal data to your supervisory authority. A list of supervisory authorities is available here: <a href="https://edpb.europa.eu/about-edpb/about-edpb/members_en">https://edpb.europa.eu/about-edpb/about-edpb/members_en</a> . If you believe your rights under the UK-GDPR have been violated, the UK-GDPR gives you the right to file a complaint with the Information Commissioner's Office at <a href="https://ico.org.uk/make-a-complaint/data-protection-complaints/personal-information-complaint/">https://ico.org.uk/make-a-complaint/data-protection-complaints/personal-information-complaint/</a> . If you believe your rights under the revFADP have been violated, you have the right to enforce your claims in court or to file a complaint with the competent data protection authority

<b>Right</b>	<b>What you can do</b>
<b>Withdraw Consent</b>	If we obtain your written consent to collect and process your personal data, you can subsequently withdraw that consent as to any further processing of such personal data
<b>Opt Out of Automated decision-making</b>	To the extent that we engage in decision-making based solely on automated processing, including profiling, which produces legal effects concerning you or which significantly affects you, you have the right not to be subject to such decision-making

You may submit a request to exercise your privacy rights, appeal our decision on your request, or ask questions about our processing of your personal data by contacting our European representative at:

EU, EEA, and Swiss Representative:

Adam Brogden

Instant EU GDPR Representative Ltd

Office 2, 12A Lower Main St., Lucan Co., Dublin K78 X5P8, Ireland

Tel.: + 353 15 549 700

[contact@gdprlocal.com](mailto:contact@gdprlocal.com)

UK Representative:

Adam Brogden

GDPR Local Ltd

1<sup>st</sup> Floor, Front Suite, 27-29 North Street, Brighton, England BN1 1EB

Office 2, 12A Lower Main St., Lucan Co., Dublin K78 X5P8, Ireland

Tel.: + 441 772 217 800

[contact@gdprlocal.com](mailto:contact@gdprlocal.com)

To submit a request, we are required to verify your identity. You will be required to provide the primary email address listed on your account. A verification email will then be sent to that email address in order to verify your identity. We may need to contact you to confirm your request.

You may use an authorized agent to submit your request. If you are an authorized agent and a consumer has given you written, signed permission to submit a request on their behalf, you must submit a copy of that permission to us in order to submit the consumer's request. We will require the consumer to verify their identity and directly confirm with us that they have provided you with permission to submit the request. You may submit such requests through the following methods set forth directly above.

If we refuse your request, we will provide you with the reason for the refusal.

## **CROSS-BORDER TRANSFERS OF PERSONAL DATA**

Personal data that you provide while in Europe will be transferred to the United States. The GDPR, the UK-GDPR, and the revFADP permit such transfer when necessary for the performance of a contract between you and us, if we obtain your explicit consent to such transfer, or if it is in our legitimate interest to transfer the personal data. The laws in the United States may not be as protective of your privacy as those in your location.

Last Updated: February 1, 2026