

Privacy Policy at Phoenix Intelligence

When you interact with Phoenix Intelligence Inc. ("we", "our" or "us"), we are dedicated to protecting your personal information (as defined below) that we collect, store, use, and share (collectively "Process"). This Privacy Policy explains when, why, and how we process your personal data, as well as your rights in connection with these activities. Our <u>Analytics and Cookies Policy</u> rounds out this Privacy Policy.

Please do not hesitate to <u>Contact Us</u> if you have any queries regarding how we handle your personal information.

When does our Privacy Policy come into effect?

When you engage with us through the services specified in this Privacy Policy, you are subject to this Privacy Policy. Specific terms may apply from time to time, and we will provide you with those terms when you participate in those activities (for example, a specific campaign or form may have specific terms).

Our Privacy Policy does not apply to any third-party websites or tools, despite the fact that we may link to them. It is your obligation, if relevant, to evaluate and agree to these third-party policies and procedures.

What does it mean to have personal data?

Any data concerning a known or identifiable individual is referred to as "Personal Data." Despite the fact that national laws have varying functional definitions of the term "personal data," we consider information to be "data" if it may be used alone or in combination with other data to identify a person.

The type of personal data we process is determined by the context of our interactions. You may provide personal data to us directly, such as part of a request or a completed form. We may also collect data as a result of activities with our websites, such as part of our <u>Analytics and Cookies Policy</u>. Personal data does not apply to all data that is processed.

What happens to your personal data when you visit our websites?

i) What methods will we use to gather your Personal Data?

We gather data in an automated manner. We will gather some Personal Data automatically when you use our websites, in addition to the Personal Data you may freely offer us by filling out a form.

ii) What types of personal data do we gather?

Your IP address, as well as other data stated in our <u>Analytics and Cookies Policy</u>, will be collected. It's important to remember that not every information that's processed qualifies as Personal Data.

iii) What is the purpose of processing your personal data?

One of the purposes of our Processing activities when you use our websites is to improve our website and service offerings. We want to learn more about how people use our websites, what interests them, and what design choices result in interaction. These kinds of insights can then be used to improve our products and services.

We also want to be able to deliver content that we believe is relevant to you. To do so, we use cookies and other similar technologies (e.g., web beacons, pixels, ad tags, and device identifiers) on our websites to recognize you and your device(s) and to tailor our websites, advertisements, and other content and communications with you based on your interest in our products and services. Our <u>Analytics and Cookies</u> <u>Policy</u> explains more about this practice.

iv) How will your Personal Information be shared with third parties?

Your Personal Data will be shared with third parties, as stated in our Analytics and Cookies Policy.

v) How long do you expect us to store your personal data?

Your personal data will be stored in accordance with our Analytics and Cookies Policy.

When you fill out a form on our website or send us an email, how is your personal information processed?

i) What methods will we use to gather your personal data?

Information you provided: We will only Process the Personal Information that you provide to us when you freely interact with us, in addition to the information that we collect automatically when you visit our website.

We've provided a variety of options for you to reach us directly, including contact forms on our websites, surveys, and email addresses. We use the Personal Information you provide us during these interactions to process it.

ii) What kind of personal data do we gather?

Form on Our Website: Each form will have various mandatory fields dependent on the purpose of the form, so the personal information we process will vary.

Email: We will Process the Personal Information in your email, such as your name, email address, and phone number, if you communicate with us via email.

iii) What is the purpose of processing your personal data?

Personal Data is processed in connection with the request or context in which it was provided by you. You consent to this Processing when you submit your data in this context.

When you fill out a form, for example, we will Process your Personal Data by responding to you and personalizing the information you supply. If you request a document to be downloaded, we will process your Data in order to deliver the content.

We want to learn more about who interacts with Phoenix Intelligence directly and acquire insights from those interactions, therefore we run analytics on the Personal Data we collect (such as time of form submission, location of form submission and industry).

In this case, the type of interaction mentioned is direct. We feel that people who fill out forms or write to us directly deserve our time and attention. As a result, we'll be able to follow up on these kinds of requests (for example to answer your query and obtain feedback).

We may contact you again to obtain your feedback on our material, to see if you'd like to receive additional content from us, or to see if our products and services are something you'd be interested in.

iv) How will your Personal Information be shared with third parties?

Form submissions are transmitted automatically to our third-party service providers, who will Process your Personal Information on our behalf for the purposes outlined above.

Personal Information contained in an email you provide us will be forwarded to our CRM third party service providers, who will Process your Personal Information on our behalf in order to connect with you (answer to your questions) and for statistical purposes.

v) What is the length of time we will keep your personal data?

Unless you request deletion as described below, we will keep your Personal Information for a reasonable period of time.

When you subscribe to one of our mailing lists, how is your personal information handled?

i) What methods will we use to gather your personal data?

We process the data you provide with your registration, such as your name and email address, when you subscribe to our mailing lists. Tracking technologies (e.g., web beacons, pixels, ad tags, and device identifiers) are used in the emails we send you, as detailed in our <u>Analytics and Cookies Policy</u>.

ii) What kind of personal data do we gather?

The type of personal data we process is determined on the registration form you fill out. Your IP address, as well as other information stated in our <u>Analytics and Cookies Policy</u>, will be collected.

iii) What is the purpose of processing your personal data?

With your permission, we process the Personal Data you provide when you sign up for a mailing list. We will Process your Personal Data to subscribe you to our promotional emails as long as you do not withdraw your consent (and of course, to send you those emails).

We believe it is critical that we provide you with content that is relevant to you, so we use cookies and similar technologies (e.g., web beacons, pixels, ad tags, and device identifiers) to I understand how you interact with our emails (whether you open them, interact with their content, or forwarded them (though we would not know to whom they were forwarded); and (ii) understand how you interact with our emails (whether you open them, interact with their content, or forwarded We also want to improve our emails and service offerings, which is one of the Processing activities' goals.

iv) What methods will we use to share your personal data with third parties?

Your Personal Data will be shared with third-party service providers who will Process it on our behalf in order to connect with you (e.g., send you our emails) and for statistical purposes.

v) How long do you think we'll keep your personal information?

We will keep your Personal Data until you tell us that you no longer want it.

What Happens to your personal data when you register for one of our webinars?

II) What methods will we use to gather your Personal Data?

We Process the information you submit together with your registration for a webinar (or other similar online conference or learning event), such as your name and email address. We employ tracking technologies in the emails we send you in connection with your registration, as specified in our Analytics and Cookies Policy (e.g., web beacons, pixels, ad tags, and device identifiers).

ii) What kind of personal data d<mark>o we g</mark>ath<mark>er?</mark>

The type of personal data we process is determined on the registration form you fill out. Your IP address, as well as other information stated in our <u>Analytics and Cookies Policy</u>, will be collected.

iii) What is the purpose of processing your personal data?

With your permission, we process the Personal Information you provide when you register for a webinar. As long as you do not withdraw your consent, we will Process your Personal Information in order to respond to your request and, if you so wish, to subscribe you to our promotional communications.

We believe it is critical that we provide you with content that is relevant to you, so we use cookies and similar technologies (e.g., web beacons, pixels, ad tags, and device identifiers) to I understand how you interact with our emails (whether you open them, interact with their content, or forwarded them (though we would not know to whom they were forwarded); and (ii) track how you interact with our emails

(whether you open them, interact with their content, or forwarded Our Processing operations additionally attempt to improve our emails and service offerings.

We will use your Personal Data to provide you with access to the webinar for which you registered, to contact you in the weeks/days leading up to the webinar to remind you of the webinar, and to follow-up with you after the webinar to see if you would like to receive more content from us, or if our products and services would be of interest to you.

iv) What methods will we use to share your personal data with third parties?

Your Personal Information will be shared with third-party service providers who will Process it on our behalf in order to connect with you (e.g., send you our emails) and for statistical purposes. Your personal information will also be shared with third-party suppliers of the platforms used to organize webinars.

v) How long do you think we'll keep your personal information?

We will keep your Personal Information until you tell us that you no longer want it.

How is personal information processed in the context of employment, such as when you apply for a job or give us your resume?

i) What methods will we use to gather your Personal Information?

Information you provide: When you apply for a job with us, we will process the personal data you provide. This could happen if you send us an email with your application or if you engage with our recruitment platform (provided by a third-party).

Information we gather from social or professional network or platform: We will determine your interest in continuing the conversation with us if we approach you through a social or professional network or platform (e.g., LinkedIn). We will manually export the information from the applicable portal to our recruitment platform if you confirm your interest (provided by a third party). It's worth noting that each of these platforms has its own set of terms and conditions for how your Personal Information is handled.

Third Parties: We may have acquired your Personal Information via headhunters or recruitment firms. Where we have arrangements with these third parties, this can be requested. When we don't have an agreement with them, this can also be unsolicited.

ii) What kind of personal data do we gather?

When you apply for a job with us, we collect your recruiting data, which includes all of the data in your curriculum vitae, cover letter, and other application materials.

When we manually export information from a social media or professional network, we will include your name, work history, and, if accessible, your email and phone number.

iii) What is the purpose of processing your personal data?

We use the Personal Information you provide to us to make hiring decisions and better understand who would be a good fit for us. This information is used in compliance with the law.

We use your personal information to contact you about job openings and to assess our current and future workforce requirements. For statistical purposes, we also aggregate and anonymize the Personal Information we gather.

iv) What methods will we use to share your personal data with third parties?

Your personal information will be shared with the third-party service providers.

v) How long do you think we'll keep your personal information?

For a period of two years, we keep the Personal Information you provide. We believe it is necessary to process this information for this time period, including in order to contact you about future possibilities in which you would be a good fit. We shall anonymize your Personal Information from our recruitment platform after this period.

Despite our best attempts to remove your name and email address from our main recruitment platform, it is possible that your name and email address will remain in the activity logs related with your application. If you wish us to erase all of your Personal Information, please contact us and, subject to relevant regulations, we will do so.

When you interact with our digital advertisement, how is personal information processed?

i) What methods will we use to gather your Personal Information?

We collaborate with third-party service providers to distribute our digital ads across various platforms and delivery methods. Our <u>Analytics and Cookies Policy</u> explains how we use these tools.

We do not intend to Process your Personal Data in this manner. If third-party advertisers or ad networks feel you meet the standards we've established, you may see our advertising. Your Personal Data was not shared with or accessed by our third-party advertisers or ad networks just because you saw our advertising.

If you click on an advertisement, you may be directed to one of our websites, where your Personal Information is processed as mentioned above.

ii) What kind of personal data do we gather?

When you click on one of our adverts, you will be taken to a landing page where we will collect some Personal Information automatically, as explained in our <u>Analytics and Cookies Policy</u>.

We may also process Personal Information you supply us via a registration or information form that appears after you click on an advertisement. The type and context of the Personal Information we process determines how we handle it.

iii) What is the purpose of collecting your Personal Information?

If you click on one of our advertisements, we will process your Personal Information in order to gain insight into who has interacted with our advertisements and adapt your experience with us accordingly. Then, in this Privacy Policy, you'll find information on the various possible Processing of your Personal Information.

iv) What methods will we use to share your personal data with third parties?

These service providers are listed in the Marketing section of our third-party service providers list, as well as our <u>Analytics and Cookies Policy</u>. Then, in this Privacy Policy, you'll find information on further possible Processing and sharing of your Personal Information.

v) How long do you think we'll keep your personal information?

We will keep your Personal Information until you tell us that you no longer want it.

When we meet in person or attend an event, how is personal information processed?

i) What methods will we use to gather your Personal Information?

From Event Organizers: We participate in a variety of industry-specific events, including trade exhibitions, conferences, and other gatherings. Meeting with people who are interested in our products and services is important to us. Some conferences will supply us with a list of attendees, while others will just offer us with a list of attendees who scanned their badges at our booth; in either instance, we will integrate these lists into our CRM platforms if we have the permissions to do so.

Information You Provide Us: When you contact with our workers during conferences, for example, when you provide us with your business card, we may transfer your Personal Information into our customer-relationship management platforms.

ii) What kind of personal data do we gather?

While the Personal Information we receive from event organizers varies from one to the next, we typically Process the following Personal Information: name, email address, employer, and title. We also process any Personal Information you supply to us directly.

iii) What is the purpose of collecting your Personal Information?

We collect your personal information in order to contact you after our meeting, to understand the number of people who attended certain events, and to follow up with you by writing in relation to our interactions, meetings, or attendance at the same event. In some situations, you have given your permission for us to contact you through the event organizers. In some cases, you explicitly grant us permission to contact you (or, we assume we can when you give us your business card.

iv) What methods will we use to share your personal data with third parties?

Your Personal Information will be shared with third-party service providers who will Process it on our behalf for the purposes of communicating with you and compiling statistics.

To facilitate our Processing of your Personal Information, we will also exchange your Personal Information with third-party service providers using internal communication means such as email or instant messaging. These service providers are listed in our list of third-party service providers' Communications and Marketing categories.

v) How long do you think we'll keep your personal information?

We will keep your Personal Information until you tell us that you no longer want it.

How do we supplement the information we have about you (Data enrichment)?

i) When do we enrich information we have about you?

It is possible that we will use third-party services to enrich the information we already have about you if you are a resident of the United States.

ii) Why do we enrich information we have about you?

Enriching data allows us to study a selection of data in greater depth, allowing us to deliver personalized content and tailor our interactions to your preferences.

iii) How long do you think we'll keep your personal information?

We will keep your Personal Information until you tell us that you no longer want it.

What additional reasons could we use to share your Personal Information?

Transfers of business: We may disclose and transfer your Personal Information without your permission in the case of a corporate event requiring such a transfer, such as a merger, acquisition, bankruptcy, or sale of assets, since it is critical to us that we have the flexibility and ability to run our company. As part of any due diligence process or transfer to that reorganized organization or third party, we may share some or all of your Personal Information with the applicable third party (or its advisers).

Legal Disclosure: We may share your Personal Information with third parties to comply with our legal obligations if we believe that disclosure is necessary to enforce our Privacy Policy, detect or prevent fraud, security, or technical issues, or to comply with any applicable law, regulation, legal process, governmental request, or certification.

Strategic partners and Affiliates: As part of our service and product delivery, we may share your Personal Information with our affiliates and strategic partners. This is done in compliance with the Privacy Privacy Policy's stated goals.

Other Purposes with your consent: We shall Process your Personal Information in line with your express consent to share it with other third parties if you have given that consent. For example, there may be times when additional terms apply, and we make it known that some third parties Process your Personal Information through these terms.

Where do we keep your personal data?

Your Personal Information will be held on our servers, or on third-party service providers' servers, which are primarily located in the United States. You agree to the transfer of information to countries other than your home country, which may have different data protection laws than your home nation. Our practices with respect to your personal information will always be governed by our Privacy Policy, and we will comply with applicable laws to ensure proper protection for the international transfer of Personal Information, where applicable.

What safeguards do we have in place to safeguard your personal data?

We employ industry-standard safeguards to help protect Personal Information in our possession from accidental or unlawful destruction, loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing. Restricted access to offices, personnel training, the use of passwords, and well-defined internal policies and practices are examples of such safeguards.

However, because no method of communication over the Internet, or method of electronic storage, is 100 percent secure, we cannot ensure or guarantee that such incidents will not occur. With this in mind, we disclaim any liability that does not arise from our gross negligence or willful wrongdoing to the fullest extent permitted by relevant law.

What are your rights in regards to the processing of your personal data by us?

We comply with all applicable rules and regulations, and we will Process your Personal Information accordingly. We make every effort to ensure that you have the following rights. We may not be able to make these rights available to you if your local laws and regulations do not compel us to make sure you can assert the below rights (or if doing so would be against applicable laws and regulations). The primary rights provided to individuals as part of privacy laws are highlighted here; however, these rights may or may not be available to you depending on where you live and where you came from. Because different countries have different rules, please contact us in writing if you wish to exercise any of the rights listed here or if you have any questions or concerns.

Access to, Accuracy and completeness of your Personal Information: We will provide reasonable access to the Personal Information we Process about you, subject to certain legal exceptions, and you have the right to challenge the accuracy and completeness of that information. If the Personal Information we

Process about you is incomplete or inaccurate, you have the right to request that we correct it as necessary.

Withdraw your consent: Subject to legal and contractual limits, you may also withdraw your permission to our processing of your Personal Information or opt-out of specific uses and disclosures.

Right to erasure: You have the right to request that any Personal Information we hold on you be deleted.

Data portability: In certain cases, you have the right to data portability.

Right to restriction of processing: You have the right to request that we limit how we process your Personal Information in certain circumstances.

Right to object: You have the right to object to the processing of your personal data that is based on our legitimate interests. You can also refuse to have your Personal Information processed for direct marketing reasons (including profiling).

Right to lodge a complaint: You have the right, without prejudice to any other administrative or judicial remedy, to lodge a complaint with a supervisory authority if you consider that our Processing of your Personal Information infringes local laws and regulations.

How do you go about exercising your rights?

Please contact us using the contact information given at the end of this document to exercise any of your rights or to contest our compliance with our Privacy Policy. We will respond to your request in line with our Privacy Policy and applicable legislation, as well as the protection of our sensitive information and that of third parties, once we have confirmed your identity.

What should you do if you disagree with our Privacy Policy?

Please do not give us with your Personal Information if you do not agree with any of the contents of or amendments to our Privacy Policy, or refer to the <u>Analytics and Cookies Policy</u> for additional information about analytics.

Changes to our Privacy Policy

We reserve the right to make changes to our Privacy Policy at any time to reflect changes in relevant laws or our business practices. At the top of this page, you'll find the most recent version of our Privacy Policy. You consent to any changes to our Privacy Policy by continuing to use our website or providing Personal Information to us.

How to contact us?

In case of any questions or comments regarding our Privacy Policy or to exercise any of your rights, please communicate with us using one of the following contact methods:

Email: contact@phoenix-intelligence.com