



Phoenix Intelligence Privacy Policy

Date: Feb 6, 2025

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 Analytics and Cookies Policy rounds out this Privacy Policy.

Please do not hesitate to Contact Us 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 Analytics and Cookies Policy. Personal data does not apply to all data that is processed.

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

3.1.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.

3.2.What types of personal data do we gather?

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

3.3.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 Analytics and Cookies Policy explains more about this practice.

3.4.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.

3.5.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?

4.1.What methods will we use to gather your personal data?

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.

4.2.What kind of personal data do we gather?

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

4.3.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.

4.4.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.

4.5.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?

5.1. 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 Analytics and Cookies Policy.

5.2. 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 Analytics and Cookies Policy, will be collected.

5.3. 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 use cookies and similar technologies (such as web beacons, pixels, ad tags, and device identifiers) to better understand how you interact with our emails—for example, whether you open them, engage with their content, or forward them to others. While we may be aware that an email was forwarded, we do not know the identity of the recipients.

This data helps us improve the relevance of our communications and enhance our service offerings. These processing activities are part of our ongoing efforts to deliver more effective and meaningful user experiences.

5.4. 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.

5.5. 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?

6.1. 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).

6.2. 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 Analytics and Cookies Policy will be collected.

6.3. 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 important to provide you with content that is relevant to you. To achieve this, we use cookies and similar technologies (such as web beacons, pixels, ad tags, and device identifiers) to understand how you interact with our emails—whether you open them, engage with their content, or forward them to others. While we may detect that an email was forwarded, we do not know the identity of the recipient. These processing activities also help us continuously improve our email communications and overall 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.

6.4. 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.

6.5. 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?

7.1. What methods will we use to gather your Personal Information?

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).

If we reach out to you via a social or professional network (e.g., LinkedIn), we may use automated tools to assess your interest in continuing the conversation with us. Should you express interest, relevant information may be automatically imported from the respective platform into our recruitment or outreach systems (provided by a trusted third party). Please note that each platform maintains its own terms and conditions regarding how your personal information is collected and processed.

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.

7.2. 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 collect information from a social media or professional network, we may use automated tools to retrieve publicly available details such as your name, work history, and, where accessible, your email address and phone number. This information is securely transferred to our recruitment or engagement platform in accordance with applicable data privacy regulations.

7.3. 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.

7.4. 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.

7.5. How long do you think we'll keep your personal information?

We retain the personal information you provide as long as it is necessary to assess your fit for current and future opportunities. Once it is no longer needed for these purposes, we anonymize your personal information within our recruitment platform.

While we make every effort to remove your name and email address from our primary recruitment system, they may still appear in system activity logs associated with your application. If you would like us to delete all of your personal information, please contact us. Subject to applicable regulations, we will process your request accordingly.

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

8.1. 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 Analytics and Cookies Policy 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.

8.2. What kind of personal data do we gather?

When you interact with one of our advertisements, you may be directed to a landing page where certain personal information is collected automatically, as described in our Analytics and Cookies Policy. Additionally, if you choose to submit a registration or information form on that page, we may process the personal information you provide. How we handle this information depends on its nature and the context in which it was collected.

8.3. 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.

8.4. 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 and are also referenced in our Analytics and Cookies Policy. Additional details regarding how your personal information may be processed or shared can be found throughout this Privacy Policy.

8.5. How long do you think we'll keep your personal information?

We may collect your personal information when we interact in person, such as at meetings or events—through business cards, event registrations, or direct conversations. We retain this information only as long as it is needed for the purposes for which it was collected or until you request its deletion, whichever comes first. All such information is processed in accordance with this Privacy Policy.

8.6. What methods will we use to gather your Personal Information?

We may collect your personal information through various industry-specific events, such as trade shows, conferences, and other professional gatherings. Engaging with individuals interested in our products and services is a key part of our outreach.

In some cases, event organizers may provide us with a list of attendees, while in others, we may receive details of individuals who scanned their badges at our booth. Where appropriate permissions are in place, this information is integrated into our customer relationship management (CRM) systems.

Additionally, when you interact with our team members during such events—for example, by providing a business card or sharing your contact details—we may enter that information into our CRM platforms to follow up on your expressed interest, in line with our Privacy Policy.

8.7. 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.

8.8. What is the purpose of collecting your Personal Information?

We collect your personal information to follow up with you after our interactions at events, meetings, or conferences. This may include contacting you to continue a conversation, providing relevant information about our services, or understanding the level of engagement at specific events.

In certain cases, you may have granted permission for us to contact you through the event organizers. Additionally, when you voluntarily share your contact details—such as by providing a business card—we interpret this as an expression of interest and a basis to initiate further communication, in line with applicable privacy regulations.

8.9. What methods will we use to share your personal data with third parties?

Your personal information may be shared with third-party service providers who process it on our behalf for purposes such as communication and statistical analysis. To support these activities, we may transmit your personal information to these providers through internal communication channels, such as email or instant messaging. These service providers are listed under the Communications and Marketing categories in our Third-Party Service Providers List.

8.10 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)?

9.1. When do we enrich information we have about you?

If you are a resident of the United States, we may use third-party services to enhance or supplement the information we already hold about you.

9.2. 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.

9.3. 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.

9.4. What additional reasons could we use to share your personal information?

We may share or transfer your personal information in several circumstances. In the event of a corporate transaction—such as a merger, acquisition, bankruptcy, or sale of assets—we may disclose your information without prior consent, as maintaining operational flexibility is essential to our business.

During any related due diligence or transfer process, your information may be shared with the relevant third party or their professional advisors. We may also disclose your personal information when required to comply with legal obligations, enforce our Privacy Policy, detect or prevent fraud, address security or technical issues, or respond to lawful requests from regulatory authorities.

In connection with the delivery of our services and products, we may share your information with our affiliates and strategic partners, consistent with the purposes outlined in this Privacy Policy.

Additionally, where you have explicitly provided consent, we may process and share your information with other third parties—for example, in cases where specific terms apply and clearly state that certain third parties will process your personal information.

9.5. 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.

9.6. 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. While we implement robust security protocols and industry-standard protections, no digital system can be guaranteed to be completely secure.

We are committed to promptly addressing and mitigating any risks, and we accept responsibility in line with applicable laws in the rare case of security incidents resulting from our direct actions or negligence.

9.7. 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.

9.7.1. 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.

9.7.2. 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.

9.7.3. Right to erasure: You have the right to request that any personal information we hold on you be deleted.

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

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

9.7.6. 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).

9.7.7. 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.

9.8 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.

How do we handle data in connection with our use of AI technologies?

We do not use client data to train third-party AI models unless explicitly authorized in writing. Inputs submitted to AI APIs are ephemeral and used solely for real-time processing. We respect client data residency preferences and review all AI-related contracts to ensure alignment with intellectual property rights, compliance obligations, and privacy standards.

Where data is transferred across jurisdictions, we rely on recognized legal mechanisms—such as Standard Contractual Clauses (SCCs) or equivalent frameworks—to ensure adequate protection of personal and sensitive data.

How do we manage international data transfers?

We store personal data on servers located in the United States or on infrastructure managed by trusted third-party partners. When transferring data across international borders, we rely on legally recognized safeguards—such as Standard Contractual Clauses (SCCs)—to ensure that data protection standards are maintained. All cross-border data transfers are conducted in accordance with applicable data protection laws and regulatory requirements. Information Security Enhancements

Do we collect data from children?

Our services are not intended for, or directed toward, children under the age of 13. We do not knowingly collect personal data from minors. If we become aware that such data has been inadvertently collected, we will take immediate steps to delete it in accordance with applicable data protection regulations.

Are there any other types of data we may collect?

Yes, in addition to standard personal data, we may collect the following types of information as part of our service engagements:

- **Professional and Business Data:** This includes names, job titles, email addresses, and contact numbers of client stakeholders involved in the engagement.
- **Client Engagement Data:** Any documents, prompts, specifications, or other materials shared with us during the course of our consulting or service delivery may be collected and processed to fulfill our obligations.
- **Integrated Systems Data:** When our services are connected to third-party platforms (such as CRMs or cloud providers), relevant metadata or operational data from those systems may be collected and processed as necessary for effective service execution.

All such data is handled in accordance with our Privacy Policy and applicable data protection regulations.

What security measures do we take to protect your data?

We apply a range of robust security measures to protect your data and ensure compliance with industry best practices. Data at rest is encrypted using AES-256 encryption, while data in transit is secured using TLS 1.2 or higher. We enforce Role-Based Access Control (RBAC),

along with Single Sign-On (SSO) and Multi-Factor Authentication (MFA), to manage system access securely.

All systems are subject to real-time monitoring, logging, and auditing to detect and respond to potential threats. Additionally, our staff undergo continuous training focused on privacy, security, and regulatory compliance to maintain a high standard of data protection across the organization.

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 Analytics and Cookies Policy for additional information about analytics.

What changes can occur in our Privacy Policy?

We may update this Privacy Policy from time to time to reflect changes in our practices, legal obligations, or other relevant reasons. The most recent version will always be available on our website, and by continuing to use our services after any such updates, you acknowledge and accept the revised terms of the Privacy Policy

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
- Website: www.phoenix-intelligence.com