

Privacy Notice – Kaia

At Park Place Technologies (Park Place Technologies, LLC, 5910 Landerbrook Drive, Mayfield Heights, OH 44124, USA) and all our subsidiaries, (“**Park Place Technologies**”, “**us**”, “**we**”), we are fully committed to the privacy of our customers. That is why we have drafted this Privacy Notice – so you can understand how seriously we take your privacy and the protection of your personal data.

By reading this Notice, you will be able to understand how we handle the contact data that we acquire directly from you and/or that we collect via acquisition from third-party providers and make informed choices about how we may process your personal data.

All personal data that we collect from third parties is processed in a lawful, fair and transparent manner, based on Regulation (EU) 2016/679 (“**GDPR**”). We follow internationally recognized principles on this, such as the principles of purpose limitation, storage limitation, data minimization, data quality and confidentiality.

What is Kaia?

Kaia is a data analytics software, which allows us to conversational intelligence services enabling us to record, store and analyze the content of online meetings.

1. Data controller

We are the data controller of all personal data that is collected and processed by Park Place Technologies for the purposes listed below.

For any questions related to this Privacy Notice, please contact: dataprivacy@parkplacotech.com.

2. Personal data processed

We collect and process certain personal data relating to you when you provide such data to us.

a. Name, contact details and other personal data.

We may acquire any or all of the following categories of personal information about you, past or current:

- Name;
- Company;
- Office Address;
- Telephone Number;
- Email Address;
- Job Title;
- Job Function and Responsibilities;
- Recording of the online meeting, which may include your image and voice;
- Information provided during and analytics extracted from online meetings, along with associated data and documentation.

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b. Special categories of personal data

It is important to mention that we do not process special categories of personal data for the purposes set out in this notice.

3. Purposes of the processing and legal bases

Why does Park Place Technologies process my personal data?

- **Recording of the meeting and conversational intelligence**
 - o If you provide your consent when joining an online meeting with us, we will use the Kaia software to record, store and analyze the content of the online meeting, in order to give us insights for improving our business communication and internal processes.
 - o The legal basis for the processing of data is your consent, which must be clear, freely given, and unambiguous (art. 6 para. 1 lett.a) GDPR).

- **Compliance**
 - o When we collect your personal data, we may be required to store it for a certain amount of time, or report it to official authorities, because we are legally required to do so.
 - o We only handle your data in this manner where this is strictly necessary in order to comply with our legal obligations.
 - o The legal basis for the processing of data is the necessity for us to comply with a legal obligation (art. 6 para. 1 lett.c) GDPR).

4. Sources of personal data

We collect personal data directly from you.

It is entirely optional for you to provide your Personal Data to Park Place Technologies for the above purposes.

5. Recipients of personal data

Your personal data may be shared with the following people/entities (“**Recipients**”):

- Entities that help us carry out our processing activities, including hosting providers, email platform providers and cloud providers such as Outreach Corporation, which provides the Kaia tool and acts as data processor on our behalf.
- People we authorise to carry out technical maintenance (such as maintenance of network equipment and electronic communications networks).
- People we authorize to process personal data in order to perform activities that are related to the activities indicated in this Notice, like our employees. These people are under binding confidentiality obligations (either legal and/or contractual).
- Other companies within the Park Place Technologies Group.
- Public entities, bodies or authorities with whom we share personal data, when strictly required by law (such as local tax, customs or law enforcement authorities).

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6. Transfers of personal data

Since we are a global Group with presence in many countries, your personal data may be transferred to recipients in multiple countries. For example, your Personal Data are processed by the US-based cloud service provider Outreach Corporation, which provides the Kaia tool and acts as data processor on our behalf. We genuinely care about your privacy and for that reason we have implemented appropriate safeguards to protect your information when it is transferred. Some of these safeguards include standard data protection clauses adopted by the European Commission, or other safeguards or conditions that are considered adequate to the relative transfer of data.

7. Retention of personal data

Retention for the provision of conversational intelligence services

We will keep your data for up to 12 months.

Your Personal Data may be kept beyond that period, where necessary for Park Place Technologies to establish, exercise or defend against any legal claims related to the performance of those services or the processing of your Personal Data, according to the statute of limitations provided for in the applicable law.

8. Data subjects' (your) rights

What are my rights, regarding my personal data?

As a data subject, you can exercise the following rights at any time:

- Access your personal data that we are processing (or receive a copy of those personal data) and obtain further information about such processing.
- Correct or modify your personal data that we are processing when it is inaccurate or incomplete.
- Request that we erase your personal data that we are processing, when you feel that the processing is unnecessary or unlawful.
- Request restriction of the processing of your personal data, when you feel that the personal data, we have on you is inaccurate, unnecessary or has been unlawfully processed.
- To exercise your right to portability: the right to obtain a copy of your Personal Data provided to Park Place Technologies, in a structured, commonly used and machine-readable format, as well as the transmission of that Personal Data to another data controller.

You can exercise any of the rights mentioned above by sending a written request to: dataprivacy@parkplacetech.com.

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As a data subject, you are entitled to file a complaint with the competent supervisory authorities for the protection of personal data, if you believe that the processing of your personal data carried out by us is unlawful.

9. Amendments

This version of our Privacy Notice entered into force on 15 November 2023. We reserve the right to partly or fully amend this Privacy Notice, or simply to update its content, for example, as a result of changes in applicable law. We will inform you of any changes we deem important as soon as they are introduced.