

Chorus & Kaia Information Notice

At Park Place Technologies (Park Place Technologies, LLC, 5910 Landerbrook Drive, Mayfield Heights, OH 44124, USA) and all our subsidiaries worldwide ("**Park Place Technologies**", "**us**", "**we**"), we are fully committed to the privacy of our customers. That is why we have drafted this 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 personal data in connection with our use of the Chorus and Kaia tools. This will help you 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 the data protection laws to which we are subject, including, but not limited to, Regulation (EU) 2016/679 ("**GDPR**"), as well as the requirements of the EU-U.S. Data Privacy Framework (under which we are self-certified). We follow internationally recognized principles on this, such as the principles of purpose limitation, storage limitation, data minimization, data quality and confidentiality.

What are Chorus and Kaia?

[Chorus](#) and [Kaia](#) are data analytics software which allow us to use conversational intelligence services enabling us to record, store and analyze the content of online meetings.

1. Data controller

The Data Controller of the personal data we collect through our use of Chorus and Kaia is Park Place Technologies, as defined above. For any information regarding the processing of the personal data by Park Place Technologies, please write to the following e-mail address: dataprivacy@parkplacetech.com. This address may also be used if you have any questions, comments or complaints about this Notice or the manner in which we process your personal data.

Park Place Technologies has appointed a local Data Protection Officer in Malaysia, in compliance with the requirements of the Malaysian Personal Data Protection Act 2010 (as amended) applicable to its local subsidiary. Our local DPO can be contacted regarding any matters related to this Act at: dpo_parkplacetechnologies@hhq.com.my.

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 data 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;

www.parkplacetechnologies.com

Chorus & Kaia Information Notice

- Information provided during and analytics extracted from online meetings, along with associated data and documentation.

b. Sensitive data

It is important to mention that we do not knowingly process sensitive data, such as health-related data, racial or ethnic origin, or political opinions, nor personal data of any children under the age of 13, 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**
 - If you provide your consent when joining an online meeting with us, we will use the Chorus and/or 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.
 - The legal basis for the processing of data is your consent, which must be clear, freely given, and unambiguous.
- **Compliance**
 - 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.
 - We only handle your data in this manner where this is strictly necessary in order to comply with our legal obligations.
 - The legal basis and general purpose for the processing of data is the necessity for us to comply with a legal obligation.

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 ZoomInfo Technologies, which provides the Chorus tool, and Outreach Corporation, which provides the Kaia tool, both of which act as data processors 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, or third parties in the event of a sale or merger.
- Public entities, bodies or authorities with whom we share personal data, when strictly required by law (such as local tax, customs, national security, or law enforcement authorities).

Chorus & Kaia Information Notice

We do not “sell” or “share” any of the personal data outlined herein for cross-context advertising purposes.

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 is processed by the US-based cloud service providers, ZoomInfo Technologies and Outreach Corporation, which provide the Chorus and Kaia tools, respectively, and act as data processors 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.

Personal data which is transferred from the EEA to our Group companies in the US is covered under our EU-U.S. Data Privacy Framework self-certification, and will be handled in accordance with Framework principles.

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, depending on the laws applicable to you, you may be entitled to exercise all or some of the following rights:

- 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.
- Opt out of the processing of your personal data as described in this Notice, where based on consent.

Chorus & Kaia Information Notice

Where applicable, you can exercise any of the rights mentioned above by sending a written request to: dataprivacy@parkplacetech.com or, if you are based in Malaysia, to: dpo_parkplacetechnologies@hhq.com.my. We will respond to privacy requests within the time permitted by applicable law and may require reasonable information to verify a request made by you and/or your agent (e.g., name and e-mail address to confirm your identity). We will not discriminate against you for asserting your privacy rights.

As a data subject, you may further be entitled, based on the laws applicable to you, 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.

As mentioned above, we adhere to the EU-U.S. Data Privacy Framework and UK Extension ("DPF") and commit to subject applicable personal data to compliance with the DPF Principles. See <https://www.dataprivacyframework.gov>. Under the DPF, we may be subject to U.S. statutory bodies and remain responsible for data shared with third parties. Under certain conditions, the DPF provides the right to invoke binding arbitration and to resolve complaints not resolved by other means.

g. Amendments

This version of our Privacy Notice entered into force on 9th September 2025. 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.