

## Direct Marketing Information Notice

At Park Place Technologies (Park Place Technologies, LLC, 747 Alpha Drive, Cleveland, OH 44123, USA) and all our subsidiaries, including Curvature LLC (“Park Place Technologies”, “us”, “we”), we are fully committed to the privacy of our customers. That’s 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.

Please note that the processing of personal data for marketing purposes by means of cookies and other tracking technologies is addressed within our website privacy policy, available at the following link: <https://www.parkplacetechnologies.com/privacy-policy/>.

All personal data that we collect from third parties is treated 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”). We follow internationally recognized principles on this, such as the principles of purpose limitation, storage limitation, data minimization, data quality and confidentiality.

### 1. Data controller

We are a data controller of all personal data that is collected and processed by Park Place Technologies for marketing purposes.

For any questions related to this Privacy Notice, please contact: [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com), or if you are based in Malaysia: [dpo\\_parkplacetechnologies@hhq.com.my](mailto:dpo_parkplacetechnologies@hhq.com.my).

### 2. Personal data processed

We collect and process certain personal data relating to you, either when you provide such data to us, or through the use of third-party providers who specialize in providing marketing leads for Business-to-Business marketing (as better detailed in section 4, below). In particular, we process:

#### a. Name, contact details and other personal data

Park Place Technologies acquires contact details of business organizations and the executives and professionals who work for those organizations. 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;
- Job related Education;
- Public Social Media URL (professional, business & employment oriented social media);

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- Interests and content preferences;
- Publicly available information about you.

### 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?

#### Direct Marketing

- We use your personal data to send you information, offers and promotions related to Park Place Technologies services, as well as surveys concerning our services.
- We use your personal data in this way because we have a legitimate interest in promoting our services to our existing and potential customer base. You are not required to allow us to use your personal data for this purpose and you will not suffer any consequences if you choose not to do so (although you may not receive further marketing communications from us thereafter).
- We may contact you for the above purpose by means of e-mail or phone-calls with operator, where permitted by the applicable laws (e.g., based on the aforementioned legitimate interest or, where required, based on your consent).

#### Germany

If you are based in Germany, please note that the processing of your personal data for Direct Marketing purposes is carried out under the following terms:

- We use your personal data to send you information, offers and promotions related to Park Place Technologies services, as well as surveys concerning our services.
- We use your personal data to contact you by means of operator-assisted phone calls to propose Park Place Technologies services that we believe may be of interest to you, where permitted by applicable laws. We process your personal data in this way because we have a legitimate interest in promoting our services to our existing and potential customer base. You are not required to allow us to use your personal data for this purpose and you will not suffer any consequences if you choose not to do so (although you may not receive further marketing communications from us thereafter).
- We may contact you for the above purposes by e-mail only where you have provided your prior consent. You may withdraw your consent at any time by writing to us or by using the unsubscribe link included in the footer of our marketing communications.

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### Profiled Marketing

- We use your personal data to send you personalized promotions related to Park Place Technologies services.
- We use your personal data in this way because we have a legitimate interest in promoting our services to our existing and potential customer base. You are not required to allow us to use your personal data for this purpose and you will not suffer any consequences if you choose not to do so (although you may not receive further marketing communications from us thereafter).
- We may contact you for the above purpose by e-mail.

#### Germany

If you are based in Germany, please note that the processing of your personal data for Profiled Marketing purposes is carried out under the following terms:

- We use your personal data to send you personalized promotions related to Park Place Technologies services.
- We use your personal data in this way because (i) we have a legitimate interest in promoting our services to our existing and potential customer base and you have previously purchased our products or services, we collected your email on that occasion, informed you about such collection, you did not object, and the promotion relates to similar products or services; or (ii) you have provided your prior consent to the use of your email for these purposes. You are not required to allow us to use your personal data for this purpose and you will not suffer any consequences if you choose not to do so (although you may not receive further marketing communications from us thereafter).
- We may contact you for the above purpose by e-mail.

### 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.
- This may be the case, for example, when you opt-out from receiving marketing communications from us: in that case, we will retain only personal data strictly necessary to ensure that we do not contact you again in the future (in this case, under restricted conditions of use).
- We only handle your data in this manner where this is strictly necessary in order to comply with our legal obligations.

### 4. Sources of personal data

- We and our subsidiaries may collect your personal data from publicly accessible sources that indicate a potential business interest in Park Place Technologies' services (such as professional websites, company webpages, trade fair interactions, or publicly available professional profiles), and, where permitted by applicable law, from third-party providers.
- If you would like to receive more detailed information on the specific source from which we obtained your personal data in an individual case, you may contact us at any time at the

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following address: [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com).

#### 5. Recipients of personal data

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

- People, companies or firms that provide us with advice and consultancy concerning accounting, administrative, legal, tax, financial and debt collection matters in connection to our processing activities.
- Entities that help us carry out our processing activities, such as hosting providers and email platform providers.
- 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).

We do not “sell” or “share” any of your 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. 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 adequacy decisions of the European Commission, 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 Marketing Purposes

We will keep your data that we process for marketing until you unsubscribe or opt-out of such communications, withdraw your consent or otherwise – where legally permitted – for a reasonable period of time, as permitted under the applicable laws and in accordance with our data retention policies.

If you decide to opt-out or withdraw your consent, we will not use your data for marketing purposes anymore; however, we may need to keep it for longer if we have an existing business relationship with you, in order to protect ourselves from liability or as strictly necessary to ensure that we do not contact you again in the future (in this case, under restricted conditions of use).

We would, in this case, keep your e-mail and potentially other contact information to ensure such information is not used again in the future for marketing purposes.

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You may object to this processing.

### Retention for Profiled Marketing Purposes

We will keep your data that we process for profiled marketing until you unsubscribe or opt-out of such communications or withdraw your consent, or otherwise – where legally permitted – for a reasonable period of time, as permitted under the applicable laws and in accordance with our data retention policies.

If you decide to opt-out or withdraw your consent, we will not use your data for profiled marketing purposes anymore; however, we may need to keep limited amount of your personal data for longer if we have an existing business relationship with you, in order to protect ourselves from liability or as strictly necessary to ensure that we do not contact you again in the future (in this case, under restricted conditions of use).

### Retention for Compliance Purposes

We will keep data we process as long as required by the specific obligation or by 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, or when you have previously objected to its processing.

Where applicable, you can exercise any of the rights mentioned above, as well as the right to otherwise opt-out of the processing of your personal data, by sending a written request to:

[dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com), or, if you are based in Malaysia, to:

[dpo\\_parkplacetechnologies@hhq.com.my](mailto: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.

Where applicable, you can also object to the processing of your personal data or withdraw your consent for Marketing and Profiled Marketing, without needing to provide any justification for this. You may deliver your objection by any available means. To ensure efficient processing of the request, we recommend following the instructions included at the bottom of our marketing messages, or by sending a written request to the e-mail address indicated above. For example:

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- For e-mail, click on the unsubscribe link in the e-mail and follow any subsequent directions.
- For text messages, respond STOP.
- For phone calls, ask the operator to be placed on our internal Do Not Call list.
- For mobile push notifications, change your permissions in the general settings for your device.

Please note that, regarding text messages, standard messaging rates apply. Texts, calls, and prerecorded messages may be generated by automatic dialing systems and technology.

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.

We adhere to the EU-U.S. Data Privacy Framework and UK Extension (“DPF”) and commit to subject to DPF Principles applicable personal data. See <https://www.dataprivacyframework.gov/>. Under the DPF, we may be subject to U.S. authorized statutory bodies (FTC and DOT) and may remain responsible for personal 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 the date displayed in its footer.—. 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 (by sending out an e-mail to the contacts on our mailing lists, and by temporarily adding a pop-up banner to our website), and they will be binding as soon as they are published on our website.