



# PARK PLACE TECHNOLOGIES

## Privacy Policy (Non-HR Data)

This Privacy Policy describes how Park Place Technologies, LLC (“**PPT US**”, “**we**”, “**us**”) handles personal data<sup>1</sup> to which it is given access, relating to individuals located within the European Union or the United Kingdom, under the EU-U.S. Data Privacy Framework Principles (“**DPF**”), including its UK Extension. It applies to personal data which does not qualify as “HR Data” under the DPF, in accordance with the definition provided in the European Data Protection Board’s EU-U.S. Data Privacy Framework F.A.Q. for European Businesses (16 July 2024)<sup>2</sup>.

This Policy also applies to Curvature, LLC, a subsidiary of Park Place Technologies, LLC. References to “**PPT US**”, “**we**” and “**us**” in this Policy should be interpreted as references to Curvature, LLC, regarding the processing of personal data originating from the European Union or the United Kingdom which the latter may carry out.

### EU-U.S. Data Privacy Framework Principles

We comply with the DPF, as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of personal data transferred from the European Union and/or the United Kingdom to the United States, as described in this Policy. We have certified to the Department of Commerce that we adhere to the DPF with respect to such personal data.

If there is a conflict between the terms in this Privacy Policy and the DPF, the DPF shall govern.

The Federal Trade Commission has jurisdiction over our compliance with the DPF and, as such, we are subject to their investigatory and enforcement powers in that context.

To learn more about the DPF, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

### What types of personal data do we handle, and why?

In the course of our business activities, we may have access to certain categories of personal data, related to individuals within the European Union or United Kingdom:

- **Actual or potential PPT Group clients.** We may access the following personal data on actual or potential contact persons or representatives for clients of the PPT Group, established in the European Union or the United Kingdom:
  - Name and surname;
  - Professional details, including job title, office address and location, company of employment, job functions and responsibilities;
  - Contact details, including personal and business phone number, personal and business e-mail address,

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<sup>1</sup> **Personal data** means any information relating to an identified or identifiable natural person or individual.

<sup>2</sup> **HR Data**, therefore, refers to “human resources data collected in the context of an employment relationship” (see p. 3, Q1 of the F.A.Q.).



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- Information collected in the context of interactions with actual or potential client contact persons, including meeting notes, IP addresses and information collected by means of cookies/other tracking technologies, (for interactions carried out online, through PPT US' website or online meetings), recordings of online meetings (potentially including image and voice), information shared during online meetings and information extracted from online meeting analytics (produced using third-party systems);

We access these personal data, concerning current clients, as part of its storage in a PPT Group-level customer relationship management system, and in connection with the performance of marketing activities, including reaching out to actual and potential clients by various means (e.g., e-mail, phone, retargeting and programmatic advertising), for the benefit of various entities of the PPT Group.

We further access these personal data to allow for global administration and management of pre-contractual and contractual phases with clients, as well as of the performance of activities related to or consequent to the execution of contracts with those clients. These data can also be accessed as part of our analysis of online meeting recordings through third-party software in order to generate insight used to improve business communications and internal processes.

It is important to note that none of our clients are consumers, as our business is strictly B2B. Therefore, while we do reach out to individuals within potential clients for these purposes, the organizations to which those individuals belong are the target of our communications, and not the individuals themselves.

- **Visitors to PPT Group premises, and users of networks, systems and/or devices managed by the PPT Group.** We may access the following personal data on actual or potential contact persons or representatives for clients of the PPT Group, established in the European Union or the United Kingdom
  - Data collected through security software tools deployed by the PPT Group, including logs of access to PPT Group premises and certain areas within those premises, and activity logs generated in relation to networks, systems and/or devices managed by the PPT Group (including details such as user identification codes, timestamps and actions taken). This includes CCTV footage, and applies to e-mail systems, web browsing, file sharing systems and other information accessed using IT resources managed by the PPT Group.

We access this personal data when strictly necessary to allow for to allow for centralized management of internal compliance assurance, access control and network/information security for the PPT Group.

## Do we transfer any personal data onwards, to other entities?

As a rule, we do not sell personal data related to actual or potential client contact persons/representatives, or any other individuals, to any third parties, or otherwise share data with third parties, other than as mentioned below.

We may transfer personal data on actual or potential PPT Group clients to the following types of third parties:

- **Other PPT Group companies**, specifically Curvature LLC (located in the US), Park Place Technologies Limited (located in the United Kingdom) and Park Place Technologies Private Limited (located in Singapore).

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- Personal data is shared with these companies because they undertake the global management of marketing activities for the benefit of the PPT Group jointly with PPT US.
- These companies act as controllers in their own right, rather than as agents on behalf of PPT US, and are therefore autonomously responsible for ensuring that these personal data are correctly handled.
- In accordance with the Obligatory Contracts for Onward Transfers Supplemental Principle of the DPF, these companies are bound by the PPT Group's Group Data Protection Compliance Framework, which is a set of internal governance documents establishing controls to ensure that personal data is handled in accordance with applicable data protection requirements – including those of the DPF. As such, continuity of the protection of personal data under the DPF is ensured in the context of this data sharing.
- **Service providers** which provide SaaS (software as a service) customer relationship management, online meeting management, analytics/business intelligence and service provision-relevant platforms and tools used by PPT US, and which may have access to personal data stored by PPT US on their platforms and tools.
  - These companies act as agents on behalf of PPT US, regarding the processing of personal data inherent to PPT US' use of their platforms and tools.

We may transfer personal data on visitors to PPT Group premises, and users of networks, systems and/or devices managed by the PPT Group to the following types of third parties:

- **Other PPT Group companies**, specifically Curvature LLC (located in the US) and Park Place Technologies Limited (located in the United Kingdom).
  - Personal data is shared with these companies because they undertake the global management of security for the PPT Group jointly with PPT US.
  - These companies act as controllers in their own right, rather than as agents on behalf of PPT US, and are therefore autonomously responsible for ensuring that these personal data are correctly handled.
  - In accordance with the Obligatory Contracts for Onward Transfers Supplemental Principle of the DPF, these companies are bound by the PPT Group's Group Data Protection Compliance Framework, which is a set of internal governance documents establishing controls to ensure that personal data is handled in accordance with applicable data protection requirements – including those of the DPF. As such, continuity of the protection of personal data under the DPF is ensured in the context of this data sharing.
- **Service providers** which provide SaaS (software as a service) security and access control management platforms and tools used by PPT US, and which may have access to personal data stored by PPT US on their platforms and tools.
  - These companies act as agents on behalf of PPT US, regarding the processing of personal data inherent to PPT US' use of their platforms and tools.

This may include personal data related to individuals within the European Union or United Kingdom, in which case the DPF applies in full. Under the DPF, PPT US will remain liable for damages caused by a [www.parkplacetechnologies.com](http://www.parkplacetechnologies.com)



failure of any of its agents, or other PPT Group companies, to handle personal data in a manner consistent with the DPF, save for where PPT US is not responsible for the event giving rise to those damages.

If you, as an individual based in the European Union or the United Kingdom, wish to opt out of the disclosure of your personal data to third parties, or if you would like more information on the specific third parties to which we may transfer your data, please reach out to us at [dataprivacy@parkplacetechnologies.com](mailto:dataprivacy@parkplacetechnologies.com).

Please note that your right to opt out, under the DPF, does not apply to transfers of your personal data to PPT US' agents. In any case, PPT US has entered into written agreements with these agents to ensure the following, in accordance with the DPF:

- The transfer of personal data to agents is only performed for limited and specified purposes (i.e., the use of their platforms and tools by PPT US for customer relationship management, online meeting management, analytics/business intelligence, service provision, security and access control purposes);
- Agents are required to provide at least the same level of privacy protection as is required by the DPF;
- Agents are required to effectively process received personal data in a manner consistent with PPT US' obligations under the DPF; and
- Agents must notify PPT US if they determine that they can no longer provide the same level of privacy protection as is required by the DPF, in which case PPT US will take reasonable and appropriate steps to stop and remediate unauthorized processing of the transferred personal data.

We will also provide a summary or representative copy of the relevant privacy provisions contained within our agreements with agents to competent authorities, upon a valid request.

It is also important to understand that we may be required to disclose personal data in response to lawful requests by competent U.S. public authorities, including to meet national security or law enforcement requirements.

### **How can you reach out to us?**

For any questions regarding this Policy, our adherence to the DPF or our practices regarding personal data, you can reach out to us at: [dataprivacy@parkplacetechnologies.com](mailto:dataprivacy@parkplacetechnologies.com).

### **What are your rights, as a data subject? How can you react if you believe that we are mishandling your personal data?**

Under the DPF, you are entitled to:

- Access the personal data we hold about you;
- Request the correction, amendment or deletion of personal data we hold about you, where it is inaccurate or has been processed in violation of the DPF.

The above rights can be restricted where the burden or expense for us in allowing them to be exercised would be disproportionate to the risks to your privacy, in your specific case. Restriction may also happen

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if allowing your rights to be exercised would violate the rights of other persons. However, we will always endeavor to allow the exercise of your rights to the fullest extent feasible.

You can exercise these rights by contacting us, at [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com). You are also allowed to opt out from the further use of your personal data for marketing purposes autonomously (e.g., by clicking on the “unsubscribe” or similar link provided in the footer of marketing e-mails sent) – please refer to our [Direct Marketing Information Notice](#) for more information on this.

In any case, you retain the right to opt out from any further processing activities which we might wish to carry out using your personal data, for purposes which are different to or incompatible with the purposes laid out in this Policy. We will notify you of any such further processing if and when it takes place, so you can exercise this right; you can also do so spontaneously by using the e-mail address provided above.

While we do not intentionally process any sensitive data under the scope of this Policy, you also have the right to opt-in (rather than merely opt-out) to any onward transfer of those data or further processing of those data, for purposes which are different to or incompatible with the purposes laid out in this Policy. If and when this becomes applicable, we will notify you so you can exercise this right; you can also do so spontaneously by using the e-mail address provided above.

In compliance with the DPF, we commit to resolving complaints about our collection or use of your personal data. European Union or United Kingdom individuals with inquiries or complaints regarding this Policy, or our compliance with the DPF, should first contact us at: [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com).

Should you consider that we have not been able to fully resolve your complaint, you remain entitled to submit your complaint to a data protection authority within the European Union, or to the United Kingdom's Information Commissioner's Office, so that the panel established by the European Union data protection authorities (DPAs) – or, where applicable, the Information Commissioner's Office – can engage us to fully resolve the issue. We may also proactively refer your complaint to these authorities.

We commit to cooperating with this panel and complying with the advice given by these authorities with regard to personal data transferred from the European Union or the United Kingdom, in the context of this Policy.

- In particular, this means that we will cooperate with these authorities in the investigation and resolution of any complaints brought against us under the DPF. It also means that we will comply with any advice given by these authorities in these cases, including where they consider that we need to take specific action to comply with the DPF (such as by offering remedies or compensation to you or other affected individuals), and that we will provide written confirmation to these authorities that such action has been taken.

Under certain conditions, it may be possible for you to invoke binding arbitration against us for complaints regarding DPF compliance which have not been resolved through the above mechanisms. Please refer to [Annex I of the DPF](#) for more information.