

## Website Privacy Policy

This document was drawn up in accordance with applicable data protection laws, including (but not limited to) arts. 13 and 14 of EU Regulation 2016/679 (hereinafter referred to as “**GDPR**”), in order to inform you about our privacy policy with regards to the processing of your personal information (“**Personal Data**”) which is collected when surfing our website (the “**Website**”) and using the online customer portal and related services (all together the “**Customer Portal**”) of Park Place Technologies, LLC or its affiliates (hereinafter, collectively, “**Park Place Technologies**” or “**we**” or the “**Data Controller**”). Any processing of Personal Data carried out by Park Place Technologies will be based on the internationally recognized principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimisation, accuracy, integrity and confidentiality.

### 1. Data Controller

The Data Controller of the Personal Data 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](mailto:dataprivacy@parkplacetech.com).

This address may also be used if you have any questions, comments or complaints about this Policy 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\\_parkplacetechologies@hhq.com.my](mailto:dpo_parkplacetechologies@hhq.com.my).

### 2. Personal Data Processing Terms

#### 2.1. Website Use

When you visit the Website, we collect and process your Personal Data in the following circumstances and for the following purposes:

##### (a) Browsing Data

When you visit the Website, the browser on your device automatically sends information to the server on our Website. This information is temporarily stored in a log file. The following information is recorded without your intervention and stored until it is automatically deleted (generally, this data will be deleted after 7 days):

- IP address of the requesting device,
- Device identifier,
- Date and time of access,
- Name and URL of the retrieved file,
- Website from which access is made (referrer URL), the browser used and, if applicable, the operating system of your computer as well as the name of your access provider.

The above data will be processed by us for the legitimate interests and purposes set out below:

- To ensure a smooth connection of the website,
- To ensure comfortable use of our website,
- To help us understand our website activity,
- To evaluate system security and stability, and
- For other administrative purposes.

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Under no circumstances do we use the data collected for the purpose of drawing conclusions about you personally.

In addition, we use cookies and other analysis tools (including tracking technologies) when you visit our Website. You will find more detailed explanations under Section 5 of this Privacy Policy and in our Cookie Policy.

### **(b) Requesting Quotes or Using our Contact Form**

If you want to request a quote, we offer you the opportunity to contact us using a contact form provided on the Website. You can also contact us using the contact form provided on the Website, if you have any questions. In this case, we will process the following Personal Data, so that we know who sent the request/question and can respond to it:

- Your name,
- The company's name,
- A valid e-mail address.

In addition, you can also decide to voluntarily, provide your phone number as further way of communication, as well as additional details, such as your country and postal code.

These Personal Data will be processed in order to give you a quote and provide further information about our services, as well as respond to any other questions or requests you may have. If necessary, we will ask that you submit further information to inform our quote or response. We may transfer your Personal Data to relevant service providers in this context, where strictly necessary to respond and in accordance with the terms of this Policy. Our legal basis for this processing is our need to take steps required in order to enter into any potential contract with your company (which, considering you are reaching out to us, amounts to a shared legitimate interest of our organizations). Failure to provide the requested Personal Data may prevent us from properly responding to your requests or questions.

We have retention processes designed to ensure Personal Data is retained for no longer than necessary for the purposes for which such data was collected, for legitimate business purposes, for the necessary performance of a contract or to otherwise meet legal requirements.

### **(c) Using our Chatbot**

On our Website, you can submit your questions about our product and services to a chatbot, which can provide real-time personalized answers to your requests and direct you to the most appropriate point of contact for additional support.

When you interact with the chatbot, we will collect any of your Personal Data that you choose to include in the prompts or requests you submit to the chatbot.

To provide you with the answers and solutions best suited to your requests and ensure comfortable use of our chatbot function, we may also process the following Personal Data about you:

- IP address of the requesting device
- Website page URL you are on
- URL of the website from which access is made (referrer URL)
- Country
- Zip code
- Number of website visits

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- Number of days since last visit
- Type of device (e.g. mobile, desktop, tablet)
- User time and actions on the website pages
- Your Personal Data is already held in our systems (e.g. your first and last name, job position, company you work for, contact data)
- Additional details collected through cookies: for more information about the cookies we use, and how we use them, see Section 5 – *Cookies* below, and our Cookie Policy (available [here](#)).

Finally, if you interact with our chatbot, we may also collect Personal Data related to you from third-party providers, to allow our chatbot to further customize its responses to your prompts. In particular:

THIRD-PARTY PROVIDER	INFORMATION NOTICE
SLI Technologies, Inc. (“ <b>Adapt.io</b> ”)	Adapt.io’s privacy notice may be found at the following address: <a href="https://www.adapt.io/privacy.htm">https://www.adapt.io/privacy.htm</a> .
API Hub, Inc. (“ <b>Clearbit</b> ”)	Clearbit’s privacy notice may be found at the following address: <a href="https://clearbit.com/privacy-policy">https://clearbit.com/privacy-policy</a> .  You can also file an opt-out or deletion request directly to Clearbit, by using the functions at the following link: <a href="https://preferences.clearbit.com/privacy">https://preferences.clearbit.com/privacy</a> .
Demandbase, Inc. (“ <b>Demandbase</b> ”)	Demandbase’s privacy notice may be found at the following address: <a href="https://www.demandbase.com/privacy/">https://www.demandbase.com/privacy/</a> .  You can also file an opt-out or deletion request directly to Demandbase, by using the functions at the following link: <a href="https://www.demandbase.com/privacy-center.html">https://www.demandbase.com/privacy-center.html</a> .
5×5 US, Llc. (“ <b>5x5</b> ”)	5×5’s privacy notice may be found at the following address: <a href="https://5x5coop.com/privacy-center/">https://5x5coop.com/privacy-center/</a> .
G2.com, Inc. (“ <b>G2</b> ”)	G2’s privacy notice may be found at the following address: <a href="https://legal.g2.com/privacy-policy">https://legal.g2.com/privacy-policy</a> .  You can also file an opt-out or deletion request directly to G2, by using the functions at the following link: <a href="https://legal.g2.com/privacy-request">https://legal.g2.com/privacy-request</a> .

We process these Personal Data based on your consent, which you can provide when first interacting with the chatbot on our Website.

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As you are only allowed to consent for the use of your own Personal Data, as a rule, please make sure you do not provide to us any Personal Data relating to other individuals. Otherwise, please be advised that you will assume all liabilities with respect to any Personal Data concerning other individuals you share with us.

Using the chatbot does not require you to provide any sensitive data (such as Personal Data concerning your health, political opinion or religious beliefs), so please do not share any such information when you make a request to the chatbot.

Personal Data collected to allow you to use our chatbot function will be processed for as long as you use it and subsequently stored for 2 years, or until you withdraw your consent, if sooner. You can withdraw your consent by sending an email to [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com).

Following your requests to our chatbot, we may contact you to provide information about our products and services. For more information on the processing activities carried out for marketing purposes and related legal bases, please consult our Direct Marketing Information Notice (available [here](#)).

### **(d) Posting/Submitting Reviews and other User-Generated Content**

When you post or submit reviews or other user-generated content to us (via the Website or otherwise), we collect your name, as well as the content of your review or other submission.

We will only process such content in order to fulfil the intended purpose of such posting or submission. We may also use this information to help us in developing our products or services and to make our marketing more relevant to your interests.

Please note that, by posting and submitting reviews and other user generated content to the Website or other public areas of our services, this user-generated content may be available to other customers, website visitors, and other third-parties. As a rule, please refrain from providing Personal Data on yourself and make sure you do not provide to us any Personal Data relating to other individuals in this context. Otherwise, please be advised that you will assume all liabilities with respect to any Personal Data concerning other individuals you share with us.

### **(e) Recruitment**

Our Website further offers the opportunity to apply for job vacancies. For more information on the processing activities carried out in this context and related legal bases, please consult the Information Notice available when you click on “Apply now” in the Website’s “Careers” section.

### **(f) Subscribing to the EOSL Newsletter**

When you subscribe to the EOSL newsletter, we collect and process your Personal Data to provide this service.

Our legal basis for such processing is its need to fulfil our contractual obligations and provide you with ESOL updates. In these cases, you don't need to provide your Personal Data, but if you decide not to, we won't be able to send you the EOSL newsletter.

## **2.2. Customer Portal Use**

When you use the Customer Portal we collect and process your Personal Data in the following circumstances and for the following purposes:

### **(a) Browsing Data**

Please see [Section 2.1\(a\)](#) of this Policy, which also applies to the Customer Portal.

### **(b) Registration**

When registering to the customer portal, we collect the following Personal Data:

- Name and surname,

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- E-mail address and account number,
- Company's name.

These Personal Data will be processed in order to provide you with access to the Customer Portal and for us to therefore perform our contractual obligations to you. In these cases, you don't need to provide your Personal Data, but if you decide not to, we won't be able to register you to the Customer Portal.

Personal data collected to allow you to register to the customer portal will be stored as long as you are registered to the Customer Portal and subsequently for 2 years.

### **(e) Browsing and Use**

When using the Customer Portal, you can provide further Personal Data on a voluntarily basis. Such data may include account information, company contact Personal Data, or payment information.

You will further have access to other information that might include Personal Data such as your concluded contracts, scheduled assets or service tickets.

Such Personal Data is processed in order to fulfil our obligations under the respective service agreement.

We retain your Personal Data for the duration of the service contract. The retention period might be longer in case other obligations oblige us to keep your data.

### **2.3. Gravatar**

Our Website uses the service Gravatar from Automatic, Inc. 132 Hawthorne Street San Francisco, CA 94107, USA.

Gravatar is a service where users can log in and store profile pictures and their e-mail addresses. If users leave contributions or comments with the respective e-mail address on other online presences (especially in blogs), their profile pictures can be displayed next to the contributions or comments. For this purpose, the e-mail address provided by the users is transmitted to Gravatar in encrypted form for the purpose of checking whether a profile has been saved for it. This is the sole purpose of the transmission of the e-mail address and it will not be used for other purposes and will be deleted thereafter.

The Gravatar service is carried out in our legitimate interests, in order to enhance customer experience and personalization of our website.

By displaying the images, Gravatar obtains the IP address of the users, as this is necessary for communication between a browser and an online service. For more information on Gravatar's collection and use of the data, please refer to Automattic's privacy policy: <https://automattic.com/privacy/>.

If users do not want an image associated with their e-mail address to appear in Gravatar's comments, you should use a non-Gravatar e-mail address for commenting. We would also like to point out that it is also possible to use an anonymous or no e-mail address if users do not wish their own e-mail address to be sent to Gravatar. Users can completely prevent the transfer of data by not using our comment system.

### **2.4. Direct Marketing**

For more information on the processing activities carried out for direct marketing purposes and related legal bases, please consult our Direct Marketing Information Notice (available [here](#)).

### **2.5. Use for Corporate Transactions**

We may process the above Personal Data in connection with or during negotiations of any proposed or actual merger, purchase, sale, joint venture, or any other type of acquisition or business combination of all or any portion of Park Place Technologies, or transfer of all or a portion of Park Place Technologies' business to another company ("Corporate Transaction") for our legitimate interests or as part of our legal obligations. Our legitimate interest or legal obligation is to transfer our assets, including the Personal Data we hold, to such third party. Where appropriate, we will anonymize your Personal Data beforehand.

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### 2.6. Compliance

When we collect your Personal Data for one of the purposes mentioned above, 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 or to protect against harm. This may be the case, for example, where we are required to retain or report your Personal Data to official authorities in order to meet tax, customs or other legal obligations.

We only handle your Personal Data where this is strictly necessary to comply with our legal obligations.

### 2.7. Misuse/Fraud Prevention

We can analyse the browsing data and other information collected on how you and others use our Website, in order to ensure the security of our Website, as well as detect and prevent any misuse of our Website.

We use your Personal Data in this manner because we have a legitimate interest in ensuring the security of our Website and preventing the use of our Website for potentially criminal purposes.

In all of these above cases, we do not knowingly collect Personal Data of children under the age of 13.

In the event that any sensitive Personal Data are processed, we will only do so where this is permitted under the applicable laws, and otherwise reasonably necessary and proportionate to:

- Verify information;
- Maintain our services;
- Provide reasonably expected goods or services;
- Resist malicious, fraudulent or illegal actions; or
- Carry out any other legitimate short-term use purposes (which do not involve profiling).

### 3. Personal Data Recipients

Your Personal Data may be shared with other 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 services;
- Entities that help us provide our services, 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 provision of our services, like our employees. These people are under legally binding confidentiality obligations.
- Other companies within the Park Place Technologies Group;
- Public entities, bodies or authorities with whom we share Personal Data, when strictly required or authorized by law (such as local tax, customs, national security, or law enforcement authorities).

This sharing will only take place if there is an appropriate legal basis for this, such as your consent, the need for sharing to address our legitimate interests (for example, in connection with the management of legal claims or Corporate Transactions), or the need to disclose Personal Data to comply with our legal obligations.

Most of these Recipients may be qualified as “processors”, handling Personal Data on our behalf. Transfers of Personal Data to those Recipients will be subject to the provisions of applicable data protection laws and existing data processing agreements, under which those Recipients are to handle Personal Data under our instructions, exclusively for the purposes for which those data were shared with them, and under appropriate security conditions.

### 4. Cross-border Transfers

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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.

### 5. Cookies

This Website and Customer Portal use cookies, and similar tracking technologies. For more specific information on this, please see our Cookie Policy [here](#), which forms a part of this Website Privacy Policy.

### 6. Data Subjects' Rights

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 or know 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 or delete your Personal Data that we are processing, when you feel that the processing is unnecessary or unlawful – you may also request data deletion where otherwise permitted under applicable laws;
- 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;
- Portability – the right to obtain a copy of the Personal Data you provided to us in a structured, commonly used, and machine-readable format, as well as to request the transmission of those Personal Data to another data controller;
- Object to the processing of your Personal Data, based on relevant grounds related to your particular situation, which you believe must prevent us from processing your Personal Data for a given purpose, or otherwise opt-out of the processing of your Personal Data. For example, you are entitled to opt-out of the “sale” or “sharing” of your Personal Data through cookies and related tools, as well as to limit the use and disclosure of your sensitive Personal Data.

Where applicable, you can exercise any of the rights mentioned above by sending a written request to: [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com), or if you are based in Malaysia, to: [dpo\\_parkplacetechologies@hhq.com.my](mailto:dpo_parkplacetechologies@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.

You can also, where appropriate, use your account on our Customer Portal to update your Personal Data directly.

As concerns marketing activities, where applicable, you can also object to the processing of your Personal Data for marketing, without needing to provide any justification for this, by selecting the appropriate link included at the bottom of marketing e-mail messages, or by sending a written request to the e-mail address indicated above. For more information on the processing activities carried out for marketing purposes and related legal bases, please consult our Privacy Notice on Marketing (available [here](#)). California residents may also request certain information about the extent to which we share Personal Data with third parties for direct marketing purposes, through the contact details provided in the mentioned Privacy Notice.

Certain U.S. privacy laws, such as in California and other states, may require us to outline, e.g., the

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categories of personal information we collected about you; the category of sources from which personal information was collected; the specific pieces of personal information collected about you; the categories of third parties with whom data was “sold” or “shared” in the last 12 months; the business or commercial purposes for which data was collected or sold; and the categories of sensitive personal information collected about you and related practices, if applicable. This information may be found by reviewing this document or, for specific pieces of Personal Data, by contacting us as outlined above.

Please note that the website may not respond to Do Not Track (DNT) signals.

We generally do not offer “financial incentives” in exchange for your provision of Personal Data.

As a data subject, you may further be 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.

### **7. Data Security**

We use suitable and reasonable technical and organisational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction, or unauthorised access, use, or disclosure by third parties. Our security measures are continuously improved in line with technological developments.

### **8. Amendments**

This version of the Privacy Policy 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.