

Website Privacy Policy

At Park Place Technologies, LLC (747 Alpha Drive, Cleveland, OH 44123, USA), we and all our affiliates (collectively “**Park Place Technologies**”, “**us**”, “**we**”) are fully committed to the privacy of our customers. That’s why we have drafted this Privacy Policy – so you can understand how seriously we take your privacy and the protection of your personal data.

By reading this Policy, you will be able to understand how we handle personal data which we may collect when you visit or use our websites (“**Websites**”), as well as when you visit or use our online customer portal(s) and related services (“**Customer Portals**”) and make informed choices about how we may process your personal data in this context. This Policy applies only to personal data gathered on and through the Websites or Customer Portal – it does not apply to any other information or websites which we do not own or operate nor to information we collect by other means.

We process personal data 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 processed by Park Place Technologies or its affiliates on users of the Websites and/or Customer Portals.

For any questions related to this Privacy Policy, please contact: dataprivacy@parkplacetechnologies.com.

2. Data Protection Officer

European Union: Park Place Technologies has appointed a Data Protection Officer (DPO) for the processing of personal data subject to the GDPR. The DPO may be contacted for matters relating to such processing:

- at dataprivacy@parkplacetechnologies.com; or
- in Germany, at mail@planit.legal.

Malaysia: If you are based in Malaysia, you may also contact the local DPO at: dpo_parkplacetechnologies@hhq.com.my.

3. Personal Data Processing Terms

3.1. Websites

When you visit our Websites, we collect and process your personal data in the following circumstances and for the following purposes:

(a) Browsing Data

When you visit our Websites, the browser on your device automatically sends information to us. 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;
- Pages, files or other Website resources requested or accessed, including their names and URLs; and
- 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.

We may also analyze the information recorded in these log files to identify patterns concerning the frequency and sequence of requests for pages or other Website resources and broader Website usage and visit trends.

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

- To ensure a smooth connection of our Websites;
- To ensure comfortable use of our Websites;
- To help us understand activity on our Websites;
- To analyze Website usage and visit trends and to improve the design, content, functionality and performance of our Websites and services;
- To evaluate system security and stability; and
- For other administrative purposes.

Under no circumstances do we use collected data to draw conclusions about you personally.

The browsing data described above may be used for the purposes listed above, including understanding usage and visit trends, and improving the design, content, functionality and performance of our Websites. Subject to users' cookie preferences and applicable law, additional Website usage data may also be collected through cookies and other analysis tools (including tracking technologies), for these purposes. Such data may include the pages or features visited, the time spent on them, the frequency of visits, the links, buttons or other Website elements selected or interacted with, and other information concerning the use of our Websites. Cookies and similar technologies may also be used for the other purposes. You will find more detailed explanations under Section 4 of this Policy and in our [Cookie Policy](#).

Personal data you may provide through our Websites or otherwise communicate to us includes:

- Contact information. We collect information about you when you provide contact information to us via e-mail, phone, mail, or through our Websites. This information may include your first and last name, e-mail address, mailing address, and phone number; and
- Feedback and correspondence. We collect the personal data you provide when you request information, respond to surveys, or correspond with us by phone, email, chatbot or otherwise.

(b) Requesting Quotes or Using our Contact Form

If you want to request a quote or otherwise contact us, we offer you the opportunity to do so using contact forms provided on our Websites. 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;
- Your company's name; and
- A valid e-mail address.

In addition, you can also decide, voluntarily, to provide your phone number as further means of communication with you, 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 a 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

(c) Using our Chatbot

On our Websites, 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;
- Number of days since last visit;
- Type of device (e.g. mobile, desktop, tablet);
- User time and actions on the website pages;
- Personal data which we already hold on you in our systems (e.g. your first and last name, job position, company you work for, contact data); and
- Additional details collected through cookies: for more information about the cookies we use, and how we use them, see Section 4 – 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. (“ Adapt.io ”)	Adapt.io’s privacy notice may be found at the following address: https://www.adapt.io/privacy.htm .
API Hub, Inc. (“ Clearbit ”)	Clearbit’s privacy notice may be found at the following address: https://clearbit.com/privacy-policy . You can also file an opt-out or deletion request directly to Clearbit, by using the functions at the following link: https://preferences.clearbit.com/privacy .

Demandbase, Inc. (“ Demandbase ”)	Demandbase’s privacy notice may be found at the following address: https://www.demandbase.com/privacy/. You can also file an opt-out or deletion request directly to Demandbase, by using the functions at the following link: https://www.demandbase.com/privacy-center.html.
5×5 US, LLC. (“ 5x5 ”)	5×5’s privacy notice may be found at the following address: https://5x5coop.com/privacy-center/.
G2.com, Inc. (“ G2 ”)	G2’s privacy notice may be found at the following address: https://legal.g2.com/privacy-policy. You can also file an opt-out or deletion request directly to G2, by using the functions at the following link: https://legal.g2.com/privacy-request.
Intercom R&D Unlimited Company, Intercom, Inc, Intercom Software UK Limited, Intercom Software Australia Pty Ltd and Intercom R&D GmbH (collectively “ FinAI ”)	FinAI’s privacy notice may be found at the following address: https://www.intercom.com/legal/privacy
Driftgoods (“ Drift.co ”)	Drift.co’s privacy notice may be found at the following address: https://drift.co/en-uk/pages/privacy-policy
TechTarget, Inc. (“ TechTarget ”)	TechTarget’s privacy notice may be found at the following address: https://www.informatechtarget.com/privacy-policy/

ZoomInfo Technologies LLC (“ ZoomInfo ”)	ZoomInfo’s privacy notice may be found at the following address: https://www.zoominfo.com/legal/privacy-policy
LinkedIn Corporation (“ LinkedIn ”)	LinkedIn’s privacy notice may be found at the following address: https://www.linkedin.com/legal/privacy-policy
Meta Platforms, Inc. (“ Facebook ”)	Facebook’s privacy notice may be found at the following address: https://www.facebook.com/privacy/policy/

We process these personal data based on your consent, which you can provide when first interacting with the chatbot on our Websites.

As you are only, as a general rule, allowed to consent for the use of your own personal data, as a rule, please make sure you do not provide any personal data to us which relates to other individuals. Otherwise, please be advised that you will assume full liability with respect to any such personal data which you choose to 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 interact with the chatbot.

We will process personal data collected to allow you to use our chatbot function for as long as you continue to use the chatbot. We will subsequently store such data for 2 years or until you withdraw your consent, if this happens sooner. You can withdraw this consent by sending an e-mail to dataprivacy@parkplacetechnology.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 our Websites or otherwise), where this functionality is enabled on our Websites, 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 our Websites 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 any personal data to us which relates to other individuals in this context. Otherwise, please be advised that you will assume full liability with respect to any such personal data which you choose to share with us.

(e) Recruitment

Our Websites further offer the opportunity to apply for job vacancies at Park Place Technologies. For more information on the processing activities carried out in this context and related legal bases, please consult the Candidate Information Notice available [here](#).

(f) Subscribing to the Our Newsletters

When you subscribe to the EOSL or other newsletter(s) made available on our Websites, 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 EOSL or other designated updates to which the newsletter(s) relates. You do not need to provide your personal data to us for this purpose, but if you decide not to, we will not be able to send you the requested newsletter(s).

3.2. Customer Portal/Account Use

When you use our Customer Portal, we collect and process your personal data in the following circumstances and for the following purposes:

(a) Browsing Data

Please see Section 3.1(a) of this Policy, which also applies to the Customer Portal and account-related functionalities.

(b) Registration

In order to use some of the services provided through the Customer Portal, you may need to create an account. When you create an account, we collect the following personal data:

- Name and surname;
- E-mail address and account number;
- Your company's name;
- Phone number; and
- Password.

These personal data will be processed in order to provide you with access to the Customer Portal or account-related functionalities and for us to, therefore, perform our contractual obligations to you. You do not need to provide your personal data to us for these purposes, but if you decide not to, we will not be able to register you on the Customer Portal or make relevant account-related functionalities available to you.

We will store personal data collected to allow you to register on the Customer Portal or benefit from account-related functionalities for as long as you remain registered and, subsequently, for a period of 2 years, unless we are required or permitted to retain such data for longer under applicable law.

(c) Browsing and Use

When using the Customer Portal, you can provide further personal data to us on a voluntary basis. Such data may include account information, company contact data, payment information, and any other information you choose to include in your profile.

We will further have access to other information that might include your 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 and to maintain and manage your account or profile, where applicable. This includes allowing us to establish and

administer accounts, issue invoices and process payments or refunds.

We retain your personal data, in this context, for the duration of the service contract. This retention period will be longer in case other obligations oblige us to keep your data for a longer period.

If you have registered for an account through our Customer Portal, you may access, review and manage certain information directly through your account. For further information on your rights and how to exercise them, please see Section 8 – Data Subjects’ Rights.

3.3. Gravatar

Our Websites use the service Gravatar from Automattic, Inc., 132 Hawthorne Street San Francisco, CA 94107, USA (“Automattic”).

Gravatar is a service through which users can log in and store profile pictures, as well as their e-mail addresses. If users leave contributions or comments with their 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: it will not be used for other purposes and will be deleted thereafter.

The processing of personal data linked to the Gravatar service is carried out based on our legitimate interests in enhancing our Websites’ customer experience and personalization.

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

If you do not want an image associated with your e-mail address to appear in comments through Gravatar, you should use an e-mail address which has not been linked to Gravatar for commenting. It is not mandatory to use any e-mail address when commenting, and so you can also choose not to use an e-mail address at all, in this case. More generally, you can completely prevent the transfer of data to Gravatar by not using our comment system.

3.4. To Participate in our Online or Offline Activities or Events

We will collect and process your personal data when you register for, or otherwise participate in, our online or offline activities, events or contests, whether through our Websites or Customer Portal.

In this context, we may process the following personal data:

- Contact information, such as your first and last name, e-mail address, mailing address and phone number;
- Company information, such as your company name and role / job title;
- Payment information, where payment is required to participate in the relevant activity, event or contest; and
- Feedback, correspondence or other information you choose to provide in connection with the relevant activity, event or contest.

We process these personal data to register you for, and allow you to participate in, the relevant activity, event or contest, and to provide the services or information you have requested. Where applicable, we process these personal data to perform our contractual obligations to you or to take steps at your request prior to providing such services.

Personal data processed in this context will be retained for as long as necessary to manage your registration and participation in the relevant activity, event or contest, and subsequently for the period necessary to comply with applicable legal, accounting or reporting obligations, or to establish, exercise or defend legal claims.

3.5. To Monitor Quality of our Services

We will process your personal data to assess and improve the quality of our customer service and to provide staff training.

In this context, we may process the following personal data, where relevant:

- Contact information, such as your first and last name, e-mail address, mailing address and phone number;
- Information relating to your requests, questions, comments, feedback or service interactions;
- Account, order, payment or service-related information, where relevant to the specific customer service interaction; and
- Voice recordings from calls to our customer service centers and support helplines, and any accompanying call transcripts and telephone numbers, where such calls are recorded in accordance with applicable laws.

Calls to our customer service centers and support helplines may be recorded and monitored for these purposes, where permitted under applicable laws and subject to any information and consent requirements that may apply.

We process these personal data on the basis of our legitimate interests in maintaining appropriate records of interactions with customers, assessing and improving the quality of our customer service and providing staff training. We consider and balance the potential impact on your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you, unless we have your consent or are otherwise required or permitted to do so by law.

Where applicable law requires consent to record calls, calls will only be recorded if the required consent has been obtained.

Personal data processed in this context will be retained for as long as necessary to assess and improve the relevant customer service interaction, provide staff training and comply with applicable legal, regulatory or internal record retention requirements, or to establish, exercise or defend legal claims. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will retain call recordings for 4 months, unless a longer retention period is required or permitted under applicable law.

3.6. Online Advertising

We may process your personal data to manage and serve ads on our Websites or on third-party websites, applications or platforms, to tailor ads to your interests and browsing history and to generally provide you with more relevant information about our services.

In this context, we may process personal data collected through cookies, web beacons, pixels and similar tracking technologies, including:

- IP address and other online identifiers;
- Internet or other electronic network activity information, including browsing history, search history, and information regarding your interaction with our Websites, applications or advertisements;
- Commercial information, where relevant to the advertising activity;
- Geolocation data or other information inferred from your use of our Websites or tracking technologies.

In addition to the cookies and similar tracking technologies used directly by us on our Websites, we may allow trusted third parties, such as advertising and marketing networks, analytics providers and social networks, to place or use cookies, web beacons, pixels and similar tracking technologies on the Website or on websites,



applications or platforms operated by others. These third parties may use such technologies to measure the effectiveness of our ads and to determine the display of content and advertising to you based on your interests, both on our Websites and on other websites, applications or platforms that you may visit.

Furthermore, we may obtain additional information about you from third-party sources, such as service providers, vendors, social media sites, and advertising agencies for the above purposes, including your contact information, buying preferences, or cookie information.

For more information on the cookies and similar tracking technologies we use, please see our [Cookie Policy](#).

For more information on the processing activities carried out for direct marketing purposes through other channels (including email and phone-calls with operator), and related legal bases, please see the “*Direct Marketing*” section, below.

3.7. 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](#)).

3.8. Use for Corporate Transactions

We may process the personal data mentioned throughout this Policy in connection with or during negotiations of any proposed or actual merger, purchase, sale, consolidation, reorganization, joint venture, or any other type of acquisition or business combination of all or any portion of Park Place Technologies, or transfer or sale of all or a portion of Park Place Technologies’ business or assets to another company, or in the event of bankruptcy (“**Corporate Transaction**”) in accordance with our legitimate interests in transferring our assets, including the personal data we hold, to a third party in this context, or as part of our associated legal obligations. Where appropriate, we will anonymize your personal data beforehand.

3.9. 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 in this manner where this is strictly necessary to comply with our legal obligations.

3.10. Misuse/Fraud Prevention

We will analyze the browsing data and other information collected on how you and others use our Websites and Customer Portal, in accordance with our legitimate interests in ensuring the security of our Websites and Customer Portal, as well as to protect, investigate and deter against misuse of our Websites or Customer Portal which may constitute a violation of the law, violation of your agreements with us, or otherwise fraudulent, harmful, unauthorized or unethical activity.

We may further process your personal data where necessary for us to pursue our legitimate interests in establishing, exercising or defending legal claims, or otherwise in protecting our, your or others’ rights.

In all of the cases described above in this Policy, we do not knowingly collect personal data of children under the age of 13.

In the event that we process any sensitive personal data, we will only do so where this is permitted under the applicable laws or 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).

4. Cookies

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

5. Personal Data Recipients

We do not sell your personal data; however, we may share your personal data with third parties for a number of reasons. Specifically, 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 and promote our services, as well as carry out our other business activities, such as hosting providers and email platform providers. We may also share your contact information and cookie information with our business partners who offer a service to you jointly with us;
- People we authorize 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 (either legal or contractual).
- Other companies within the Park Place Technologies Group, including related organizations, for use consistent with this Privacy Policy;
- Third parties, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy; and
- Public entities, bodies or authorities, when strictly 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.

Unless otherwise indicated at the time we collect your personal data, if we allow Recipients to access such personal data, we will have contractual provisions or other appropriate protections in place to ensure such access is for limited purposes and in compliance with this Privacy Policy. In particular, transfers of personal data to Recipients which are qualified as “data processors” – in that they process personal data on our behalf – 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.

6. Cross-border Transfers

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 or by the competent UK authorities, standard data protection clauses adopted by the European Commission or by the competent UK authorities, or other safeguards or conditions that are considered adequate to the relative transfer of data under the applicable legislation.

7. Security

The security of your personal information is important to us. We take a number of organizational, technical and physical measures that are designed to protect the personal information we collect. In particular, we use suitable and reasonable technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction, or unauthorized access, use, or disclosure by third parties. Our security measures are continuously improved in line with technological developments.

However, security risk is inherent in all internet and information technologies, such that we cannot guarantee the absolute security of your personal data.

8. 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 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;
- Exercise your right to portability: the right to (1) obtain a copy of the personal data you have provided to us and which we process based on your consent or a contract we have with you, in a structured, commonly used and machine-readable format, and/or (2) transmit 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; and
- Withdraw your consent to processing 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, yourself or through an authorized agent, to: dataprivacy@parkplacetech.com or, if you are based in Malaysia, to: dpo_parkplacetechnologies@hhq.com.my. Please ensure requests are described with sufficient detail so we can properly respond to them, including by specifying which right(s) you are exercising and providing your name, e-mail and scope of your request.

If you have registered for an account through our Websites or Customer Portal, you can access, review and manage many changes yourself via your account, including updating your profile information and changing your communication preferences. If the information you are seeking is not available within your account, you can contact us as detailed above and ask us to change, update or fix your information in certain cases, particularly if it is inaccurate.

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 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.



Do Not Track Disclosures

Do Not Track (“DNT”) is a privacy preference that users can set in their web browsers. When a user turns on DNT, the browser sends a message to websites requesting that they do not track the user across sites. This Website and the Customer Portal respond to certain DNT browser settings and signals and, if you have enabled these signals, this Website will prevent our third party advertising partners (such as social media companies and ad networks) from continuing to collect information about you and your activity on our Website through the use of third party cookies, tracking pixels, and other tools. However, even with these signals enabled, we will continue to collect other information about you and your activity through the use of cookies, tracking pixels, and other tools as described elsewhere in this Privacy Policy. For information about DNT, visit www.allaboutdnt.org.

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

Our Websites recognize Global Privacy Control (GPC) signals and will automatically opt you out of the processing of your Personal Data for targeted advertising if you have turned on such signals. If you have not turned on such signals, to opt out of the processing of your personal data for targeted advertising, you must turn off third-party advertising trackers on any device used to access our Websites. To do so, [click here](#).

We will respond to privacy requests within the time permitted by applicable law, making an effort to respond promptly, and may require reasonable additional information to verify a request made by you and/or your agent (e.g., name and e-mail address to confirm your identity). If we decline your request, we will tell you why, subject to legal restrictions. We will not discriminate against you for asserting your privacy rights.

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. If you are based in the European Union, you can find your relevant supervisory authority [here](#).

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.

9. Third Party Sites and Services

Our Websites and Customer Portal may contain links to other websites and services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. We do not control third-party websites, applications or services, and we are not responsible for their actions. Other websites and services follow different rules regarding their collection, use and sharing of your personal data. We encourage you to read their privacy policies to learn more.

10. Amendments

This version of our Privacy Policy entered into force on [..]. We reserve the right to partly or fully amend this Privacy Policy, 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, through the available channel(s) we deem most reasonable in light of the context of the specific change, once 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 upon us as soon as they are published on our Websites and Customer Portal.

11. Location-Specific Disclosures

The law requires that we provide additional disclosures to residents of certain countries, regions and states. Please see below for disclosures that may be applicable to you.

Notice to California Residents

If you are a California resident, this section applies to you in addition to the rest of this Privacy Policy.

Personal Information We Collect. We collect your personal information when you interact with our Site or otherwise communicate with us. In the past 12 months, we have collected the following categories of personal information from consumers and have used that information for the following purposes:

Category of Personal Information Collected	Business Purpose of Collection	Source(s) of Information
Identifiers, including real name, postal address, online identifier, Internet Protocol address, email address, telephone numbers.	To provide our services to you	Directly from you when you contact us, set up an account, order or pay for services
Occupation, professional, or employment-related information	To provide our services to you and communicate with you	Directly from you when you set up an account, order or pay for services
Financial information, including bank account number; credit card number; debit card number; and payment history	To fulfill your orders for our services	Directly from you when you pay for services
Commercial information, including products or services purchased	To fulfill your orders for our services	Directly from you when you pay for services
Voice recordings from phone calls and any accompanying call transcripts and telephone numbers	To assess and improve the quality of our customer service and to provide staff training	Directly from you when you participate in a marketing or sales call that is recorded based on our legitimate interest to which you have not objected. Where applicable law requires consent to record calls, calls will only be recorded if the required consent has been obtained.
Internet or other electronic network activity information, including browsing history, search history, and information regarding an individual's interaction with an internet site, application, or advertisement	To provide you more relevant content, track original Website/Customer Portal visits, and optimize your experience as well as to ensure our systems are properly functioning	Passively from you when you visit and navigate our Websites and Customer Portal, click on advertisements, or receive or interact with our communications
Geolocation data	To provide our services and assist in identifying Website/Customer Portal traffic patterns	Passively when you visit our Websites or Customer Portal

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible business purposes without providing you notice.

Retaining Your Information. We will only keep your personal information in an accessible form which can identify you for as long as we need to for the purposes for which it was collected. Because retention periods vary depending on the purpose for collection, we use certain categories and criteria to determine how long we keep personal information, as further described below. Where your personal information is used for more than one purpose, we will retain your Information for the longer of those periods.

Type of Personal Information	Retention Period
Personal information processed in connection with customer matters	Up to 3 years after we have closed your account, unless: (a) otherwise required by applicable law; (b) required for regulatory, compliance or insurance purposes; (c) a longer limitation period applies in respect of specific types of actions/documents;

	(d) there is a dispute that requires it to be kept for longer; or (f) there is another legitimate reason which requires it to be kept for longer.
Personal information held in our electronic backups	Our electronic backups are retained for 6 weeks.

When we no longer require your personal information, we will take steps to delete or anonymize it. If the information cannot be permanently deleted or anonymized (for example when it is stored in our electronic backups), we will take appropriate steps to ensure that it is: (a) not used in connection with any decision involving you; (b) not shared with anyone except when we are legally required to do so; (c) kept secure; and (d) permanently deleted once possible.

Sharing Your Information. We do not sell your personal information but may disclose some of your personal information to third parties for business and commercial purposes, including sharing certain personal information for cross-context behavioral advertising purposes. In the past 12 months, we have disclosed the following categories of personal information to certain third-party subcontractors and service providers for a business purpose:

Category of Personal Information Disclosed	Category of Third Parties with Whom Information is Disclosed	Purpose for Disclosure
The following identifiers: real name, alias, mailing address, email, account name, phone number, and unique personal identifiers such as online identifiers and IP address	Our customer relationship management software, internet service providers, mail houses or printers, and payment processors	To help us provide our Websites, Customer Portal and related services
The following financial information: bank account number; credit card number; debit card number	Our payment processors	To provide you with our services
Commercial information, including products or services purchased	Our third party contracted service providers	To provide you with our services
Voice recordings from phone calls and any accompanying call transcripts and telephone numbers	Our third party contracted service providers	To assess and improve the quality of our customer service to you
The following internet or electronic information: browsing history, search history, and information regarding an individual's interaction with an internet site, application or advertisement	Our customer relationship management software, internet service providers, marketing intelligence service providers, and payment processors	To help us provide our Websites and Customer Portal

Additionally, in the past twelve (12) months we have shared with advertising and marketing networks and providers, data analytics providers, and social networks the following information for cross-context behavioral advertising purposes: identifiers, including your email address, phone number and IP address; commercial information; and internet or electronic activity information, including browsing history, search history, and information regarding an individual's interaction with an internet site, application or advertisement. You can opt-out of the sharing of your personal information for cross-context behavioral advertising as detailed in the "Exercising Your Right to Opt Out" section, below.

Sensitive Personal Information. We do not use or disclose sensitive personal information except as necessary to provide you with our services, consider you for employment opportunities, and prevent fraud.

Personal Information of Children. We have no actual knowledge that we sell or share personal information of consumers under 16 years of age.

Your Rights. California residents have certain rights regarding their personal information:



- *Right to Know.* You may request no more than twice in a 12-month period that we provide you with copies of specific personal information we have collected, sold, or disclosed about you. However, under California law, we cannot provide you with certain sensitive information, despite your request (for example, we will not send you copies of your social security number even if it is something we collected).
- *Right to Delete.* You may request that we delete certain personal information we have collected about you, with certain exceptions.
- *Right to Correct.* You may request that we correct inaccurate personal information that we maintain about you.
- *Right to Opt Out.* You may opt out of the sharing of your personal information to third parties for cross-context behavioral advertising purposes.
- *Shine the Light.* Under California's "Shine the Light" law, you have the right to ask us once a year if we have shared your personal information with third parties for direct marketing purposes.

Exercising Your Rights to Know, Delete, Correct, or Shine the Light. To exercise your rights above, please submit a request to by filling out our request form found [here](#), by emailing us at dataprivacy@parkplacetechnology.com or by calling us at 1 (800) 343 4654. Please describe your request with sufficient detail so we can properly respond to your request. As part of your request, please specify which right you are exercising and be prepared to provide your name, email, account name/agreement number, if applicable. We may ask for additional information to verify your identity. The information you provide in your request and any follow-up information we ask for from you will be used solely to verify your request. Only you or an individual designated as your authorized agent to act on your behalf may make a request related to your personal information. We may ask for additional information from you or an authorized agent to verify the agent's identity and their authority to act on your behalf. After receiving your request, we may need to contact you or your agent for further information and will notify you or your agent if your request has been granted or declined, or if an exception applies to your request. We will not discriminate against you if you choose to exercise your rights.

Exercising Your Right to Opt Out. Our Websites and Customer Portal recognize opt-out preference signals, which are also called Global Privacy Control (GPC) signals, and will automatically opt you out of the sharing of your information in a frictionless manner if you have turned on such signals. Some browsers turn on GPC signals automatically, but you may need to configure your browser or use a browser extension to enable such signals. Even if you do not currently use GPC signals, you may still opt out of the sharing of your personal information, but to do so you must turn off third-party advertising trackers on any device used to access the Site. Please [click here](#) and follow the directions for updating your Cookie Preferences to turn off these trackers.

Responding to Your Rights Request. We will try to respond to your request within 45 days. If we need more time, we will contact you with the reason we need more time and the extension period. We will deliver our written response by mail or electronically, at your option. In response to your request to know, we will only disclose the information we have collected in the 12 months prior to our receipt of your request. Our response will also explain the reasons we cannot comply with any request, if applicable. We do not charge a fee to process or respond to your request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate prior to completing your request.

If you have any questions or concerns about our privacy practices or information practices, please contact us at dataprivacy@parkplacetechnology.com.

Notice to Colorado, Connecticut, Utah and Virginia Residents

We do not process your personal information for the purpose of profiling in furtherance of decisions that produce legal or similarly significant effects concerning consumers. We also do not collect sensitive data about you or make sensitive data inferences. If we do so in the future, we will obtain your consent before doing so and we will provide you with more details about the purposes of processing and data retention periods with respect to any sensitive data at the time of collection. We will only retain your information as long as it is reasonably necessary for the purposes for which it was processed.



If you have submitted a rights request as described in the *Your Rights* section above, we will try to respond to your request within 45 days. If we need more time, we will contact you with the reason and the extension period. We will respond to your request by mail or electronically, at your option, and will notify you if your request has been granted or declined, if an exception applies to your request, any reason we cannot comply with your request, or if we need additional information. We will not discriminate against you if you choose to exercise your rights hereunder. You have the right to appeal our refusal to take action on a rights request within 30 days after receiving our decision by contacting us at dataprivacy@parkplacotech.com. We will try to inform you of our decision in writing within 60 days after receipt of your appeal, with a written explanation of our decision. The information you provide in your request and any follow-up information we ask for will be used solely to verify your request and will be deleted as soon as practical after processing your request. We will not charge a fee to process or respond to your request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate prior to completing your request.

Notice to Nevada Residents

Nevada law gives Nevada consumers the right to request that a company not sell their personal information for monetary consideration to certain other parties. We do not sell your personal information for monetary consideration; however, this right still applies. If you are a Nevada consumer and wish to exercise this right, please submit your request by contacting us at dataprivacy@parkplacotech.com.