

## Privacy Notice

Last Updated: December 2020

Innovisk Capital Partners, LLP and our affiliated entities which may link to this Privacy Notice (“Innovisk,” “we,” “us”) are committed to privacy and to transparency in our information practices. In this privacy notice, we describe our collection, use, disclosure and processing of personal information that we collect online via our Websites, as well as related to our products and services.

### Overview of Our Collection and Use of Personal Information

This overview is intended to summarize key information about our information practices, which are further explained below. ([Go directly to full privacy policy.](#)) While the actual information we collect and our use of such personal information varies depending upon the nature of our relationship and interactions, the table below provides a general overview of the categories of personal information we may collect and the purposes for which we use such information.

Categories of personal information we collect	How we use personal information
<b>Name, contact information and other identifiers:</b> identifiers such as a real name, alias, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	<b>Providing support and services and operating our Website</b>
<b>Customer records:</b> paper and electronic customer records containing personal information, such as name, signature, physical characteristics or description, address, telephone number, education, current employment, employment history, social security number, passport number, driver’s license or state identification card number, insurance policy number, bank account number, credit card number, debit card number, or any other financial or payment information, medical information, or health insurance information.	<b>Analyzing and improving our business</b>  <b>Personalizing content and experiences</b>
<b>Protected classifications:</b> characteristics of protected classifications under California or federal law such as race, color, sex, age, religion, national origin, disability, citizenship status, and genetic information.	<b>Advertising, marketing and promotional purposes</b>
<b>Commercial Information:</b> including records of real property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.	<b>Securing and protecting our business</b>
<b>Usage data:</b> internet or other electronic network activity Information including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet website, application, or advertisement.	<b>Defending our legal rights</b>
<b>Geolocation data:</b> precise geographic location information about a particular individual or device.	<b>Auditing, reporting, corporate governance, and internal operations</b>
<b>Biometric information:</b> physiological, biological or behavioral characteristics that can be used alone or in combination with each other to establish individual identity, including DNA, imagery of the iris, retina, fingerprint, faceprint, hand, palm, vein patterns, and voice recordings, keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information. (to the extent permitted and subject to applicable laws)	<b>Complying with legal obligations</b>
<b>Audio, video and other electronic data:</b> audio, electronic, visual, thermal, olfactory, or similar information such as, CCTV footage, photographs, and call recordings.	
<b>Employment history:</b> professional or employment-related information.	
<b>Education information:</b> education information and records.	

<b>Profiles and inferences:</b> Inferences drawn from any of the information identified above to create a profile reflecting a resident’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	
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**Individual rights.** Please see the Individual Rights and Choices section below for a description of the choices we provide and the rights you have regarding your personal information. If you are a California resident, please be sure to review the section [Additional information for California Residents](#) below for important information about the categories of personal information we collect and disclose and your rights under California privacy laws.

## 1. Scope

This privacy notice describes, generally, how Innovisk, in our capacity as a ‘controller’ or a ‘business’ under applicable laws, handles and processes personal information related to:

- the use of our Websites and associated services that link to this privacy notice, including <https://www.innovisk.com/> and other Websites controlled by Innovisk (the “Websites”)
- our former, current and prospective clients
- individuals who communicate with us
- individuals who use our products and services (“Services”) and individuals whose personal information we receive in providing the Services

Our collection, use and disclosure and processing of personal information about individuals will vary depending upon the circumstances. This privacy notice is intended to describe our overall privacy and data protection practices. In some cases, different or additional notices about our data collection and processing practices may be provided and apply to our processing of certain personal information.

**Personal information.** In this privacy notice, our use of the term “personal information” includes other similar terms under applicable privacy laws—such as “personal data” and “personally identifiable information.” In general, personal information includes any information that identifies, relates to, describes, or is reasonably capable of being associated, linked or linkable with a particular individual

**Not covered by this notice.** This privacy notice does not apply to job applicants and candidates who apply for employment with us, or to our employees and non-employee workers, whose personal information is subject to different privacy notices which are provided to such individuals in the context of their employment or working relationship with Innovisk.

## 2. Controller and Responsible Innovisk Entity

The controller for your personal information we collect pursuant to this Policy is: Innovisk Capital Partners LLP (Reg. No. OC422373), 30 Fenchurch Avenue, London, England, EC3M 5AD.

## 3. Cross-border Transfer

Innovisk is a global company and the data that we collect from you may be transferred to, accessed, processed or stored in, and subject to requests from law enforcement in, jurisdictions outside of your home jurisdiction, including the United States, the European Union and other jurisdictions, in which we or our service providers operate. Some of these jurisdictions, including the United States, may not provide equivalent levels of data protection as your home jurisdiction. We have established safeguards to protect personal information that is transferred to other countries, including appropriate contractual protections. For more information on the appropriate safeguards in place, please contact us using the details below.

## 4. Personal Information Collected

We collect personal information directly from individuals, automatically related to the use of the Services and Websites, and in some cases, from third parties (such as social networks, platform providers, payment processors, and operators of certain third-party services that we use). Generally, we collect your personal information on a voluntary basis. However, if you decline to provide certain personal information that is marked mandatory, you may not be able to access certain services or we may be unable to fully respond to your inquiry.

The personal information that we collect and process will vary depending upon the circumstances. For example, the personal information we may collect through our Websites includes:

- your name, postal address, email address, phone number, occupation and other contact information
- information regarding your interactions with us and related to your use of our Websites and Services
- interests you have in relation to our Services or our practice areas;
- information you may voluntarily submit to us by completing any form on our Websites
- information about your usage of our Websites and Services

We may also collect additional personal information in providing our Services, operating our business, and interacting with individuals in the course of our business, which may at times include “sensitive” information (otherwise known as “special categories of personal information” under the GDPR), such as health records or criminal conviction data. In these instances, we will provide specific data processing information to you regarding how we may process that data and what rights you may have regarding such processing.

**Categories of Sources of personal information we collect.** We may collect personal information directly from you, as well as automatically related to your use of our Websites and other services, as well as from third parties. For example, we collect personal information:

- from you, either directly (i.e., through information you submit to us, including via forms that you may complete and submit through our Websites) or indirectly (i.e., by observing your actions on our Websites)
- from the content of surveys that you may complete;
- from 'cookies' and other similar tools deployed on parts of our Websites (for further information regarding cookies used on our Websites, please see Section 7 below)
- from our clients in connection with us providing professional services to them
- from other sources, such as public databases, joint marketing partners, social media platforms (including from people with whom you are friends or otherwise connected) and from other third parties.

**Categories of personal information we collect.** While the personal information we collect varies—as explained above—depending upon the nature of the services provided or used and our interactions with individuals, we may collect the following categories of personal information (subject to applicable legal requirements and restrictions):

- **Identifiers:** identifiers such as a real name, alias, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- **Customer records:** paper and electronic customer records containing personal information, such as name, signature, physical characteristics or description, address, telephone number, education, current employment, employment history, social security number, tax ID, passport number, driver's license or state identification card number, insurance policy number, bank account number, credit card number, debit card number, or any other financial or payment information, medical information, or health insurance information.
- **Protected classifications:** characteristics of protected classifications under California or federal law such as race, color, sex, age, religion, national origin, disability, citizenship status, and genetic information.
- **Commercial Information:** including records of real property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.
- **Usage data:** internet or other electronic network activity information including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement.
- **Geolocation data:** precise geographic location information about a particular individual or device.
- **Audio, video and other electronic data:** audio, electronic, visual, thermal, olfactory, or similar information such as, CCTV footage, photographs, and call recordings.
- **Employment history:** professional or employment-related information.
- **Education information:** education information and records.
- **Profiles and inferences:** Inferences drawn from any of the information identified above to create a profile reflecting a resident's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.

## 5. Purposes and Legal Bases for Processing Personal Information

Certain laws, including the GDPR, required that we inform you of the legal bases for our processing of your personal information. Pursuant to the GDPR (and other relevant laws), we process personal information for the following legal bases:

- **Performance of contract:** to perform contracts that you may have with us (for example if you use our Services)
- **Compliance with laws:** to comply with our legal obligations
- **Our legitimate business interests:** in furtherance of our legitimate business interests including:
  - to facilitate your participation in interactive features you may choose to use on our Websites and personalize your experience on the Websites by presenting content tailored to you
  - to correspond with you, notify you of events or changes to our service, or otherwise respond to your queries and requests for information, which may include marketing to you
  - for the purposes of providing professional services to you via Innovisk applications; such services will be subject to additional terms and conditions of use including privacy
  - for data analysis, audits, fraud monitoring and prevention, and developing new products, enhancing, improving or modifying our Websites, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities
  - to protect and defend our legal rights and interests and those of third parties

- **With your consent:** Where applicable laws require that we obtain your consent to collect and process your personal information, we will obtain your consent accordingly. When we obtain your consent, the GDPR (where it applies) and other applicable laws give you the right to withdraw your consent. You can do this at any time by contacting us using the details at the end of this privacy notice. In some jurisdictions, your use of the Websites may be taken as implied consent to the collection and processing of personal information as outlined in this privacy notice.

**Purposes for using personal information.** While the purposes for which we may process personal information will vary depending upon the circumstances, in general we use personal information for the purposes set forth below. Where GDPR or other relevant laws apply, we have set forth the legal bases for such processing (see above for further explanation of our legal bases) *in parenthesis*.

- **Providing support and services:** including to provide our Services, operate our Websites, applications and online services; to communicate with you about your access to and use of our Services; to respond to your inquiries; to provide troubleshooting, fulfill your orders and requests, process your payments and provide technical support; and for other customer service and support purposes. (*Legal basis: performance of our contract with you; and our legitimate interests*)
- **Analyzing and improving our business:** including to better understand how users access and use our Services and Websites, to evaluate and improve our Websites, Services and business operations, and to develop new features, offerings and services; to conduct surveys and other evaluations (such as customer satisfaction surveys); and for other research and analytical purposes. (*Legal basis: our legitimate business interests*)
- **Personalizing content and experiences:** including to tailor content we send or display on our Websites and other Services; to offer location customization and personalized help and instructions; and to otherwise personalize your experiences. (*Legal basis: our legitimate business interests and/or with your consent*)
- **Advertising, marketing and promotional purposes:** including to reach you with more relevant ads and to evaluate, measure and improve the effectiveness of our ad campaigns; to send you newsletters, offers or other information we think may interest you; to contact you about our Services or information we think may interest you; and to administer promotions and contests. (*Legal basis: our legitimate business interests and/or with your consent*)
- **Securing and protecting our business:** including to protect and secure our business operations, assets, Services, network and information and technology resources; to investigate, prevent, detect and take action regarding fraud, unauthorized access, situations involving potential threats to the rights or safety of any person or third party, or other unauthorized activities or misconduct (*Legal basis: our legitimate business interests and/or compliance with laws*)
- **Defending our legal rights:** including to manage and respond to actual and potential legal disputes and claims, and to otherwise establish, defend or protect our rights or interests, including in the context of anticipated or actual litigation with third parties. (*Legal basis: our legitimate business interests and/or compliance with laws*)
- **Auditing, reporting, corporate governance, and internal operations:** including relating to financial, tax and accounting audits; audits and assessments of our operations, privacy, security and financial controls, risk, and compliance with legal obligations; our general business, accounting, record keeping and legal functions; and related to any actual or contemplated merger, acquisition, asset sale or transfer, financing, bankruptcy or restructuring of all or part of our business. (*Legal basis: our legitimate business interests and/or compliance with laws*)

- **Complying with legal obligations:** including to comply with the law, our legal obligations and legal process, such warrants, subpoenas, court orders, and regulatory or law enforcement requests. (*Legal basis: our legitimate business interests and/or compliance with laws*)

**Aggregate and de-identified information.** We may de-identify personal information and create anonymous and aggregated data sets and reports in order to assess, improve and develop our business, products and services, prepare benchmarking reports on our industry and for other research, marketing and analytics purposes.

## 6. Disclosure of Personal Information

We disclose the personal information we collect as set forth in this section.

### A. Purposes for Which We Disclose Personal Information

Innovisk may disclose your personal information to any Innovisk group company for the uses and purposes set out above, including for marketing the products and services offered by other businesses across the Innovisk group (subject to applicable laws). We may also disclose your personal information for the following reasons:

- to third party service providers such as entities providing customer service, email delivery, auditing, hosting our websites and other services
- to third parties involved with events that you register for, to facilitate your participation in those events
- if we are obliged to disclose your personal information under applicable law or regulation, which may include laws outside your country of residence
- in order to enforce or apply our Websites' terms of use, or to protect the rights, privacy, safety or property of Innovisk, our clients, affiliates or other parties
- subject to applicable laws, to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence
- in connection with the planning, due diligence and implementation of commercial transactions, including a reorganization, merger, sale of all or a portion of our assets, a joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings)—in such cases, your personal information will be transferred to the acquiring entity
- in accordance with the separate terms and conditions of use that may apply to you or with your explicit consent.

We request those external service providers to implement and apply security safeguards to ensure the privacy and security of your personal information. These third parties have agreed to confidentiality restrictions and to use of any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us.

**Aggregate and de-identified information.** We may share aggregate or de-identified information, which does not identify and is not linked or linkable to a particular individual, with third parties for research, marketing, analytics and other purposes.

## B. Categories of Personal Information Disclosed.

Certain privacy laws (such as the California Consumer Privacy Act (“CCPA”)) require that we disclose the categories of Personal Information that we have disclosed for a business purpose as well as the categories that we have “sold” (as that term is defined under the CCPA or other applicable laws). Please review the descriptions of the categories of personal information under the [Personal Information Collected](#) section above, for further descriptions of each category of personal information.

**Categories of personal information disclosed for a business purpose.** In general, we may disclose the following categories of personal information in support of our business purposes identified above:

- Identifiers
- Customer records
- Protected classifications
- Commercial Information
- Usage data
- Geolocation data
- Audio, video and other electronic data
- Employment history
- Education information
- Profiles and inferences

We have disclosed the categories of personal information listed above to the following categories of third-parties in the preceding twelve months: Insurance companies.

**Categories of personal information sold.** While we do not disclose personal information to third parties in exchange for monetary compensation from such third parties, we do disclose or make available personal information to third parties, in order to receive certain services or benefits from them, such as when we allow third party tags to collect information such as browsing history on our Websites, in order to improve and measure our ad campaigns. The CCPA defines a “sale” as disclosing or making available to a third party Personal Information in exchange for monetary or other valuable consideration. Pursuant to the CCPA, the categories of Personal Information that we may “sell” as defined under the CCPA includes:

- Identifiers
- Usage data
- Geolocation data

## 7. Cookies and Tracking

Our Websites may use first party and third-party cookies, pixel tags, plugins and other tools to gather device, usage and browsing information when users visit our Websites or use our online services. For instance, when you visit our Websites, our server may record your IP address (and associated location information) and other information such as the type of your internet browser, your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, and the pages you view and links you click on our Websites, as well as date and time stamps associates with your activities on our Websites.

We use the information for security purposes, to facilitate navigation, to personalize and improve your experience while using the Websites, to improve and measure our advertising campaigns and to better reach users with relevant advertising both on our Websites and on third party Websites. We also gather statistical information about use of the Websites in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them.

**Cookies.** Cookies are small text files that a website transfers to your hard drive to store and sometimes collect information about your usage of Websites, such as time spent on the Websites, pages visited, language preferences, and other anonymous traffic data. You can control the way in which cookies are used by altering your browser settings. You may refuse to accept cookies by activating the setting on your browser that allows you to reject cookies. However, if you select such a setting, this may affect the functioning of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access or log on to our Website. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Pixel tags and other similar technologies.** Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Websites to, among other things, track the actions of users of the Websites (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Websites and response rates. We and our service providers also use pixel tags in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

**Log files.** Most browsers collect certain information, such as your IP address, device type, screen resolution, operating system version and internet browser type and version. This information is gathered automatically and stored in log files.

**Third Party Analytics Tools.** Our Websites may use automated devices and applications operated by third parties (e.g., Google Analytics), which use cookies and similar technologies to collect and analyze information about use of the Websites and report on activities and trends.

**Do-Not-Track signals.** Please note that our Websites do not recognize or respond to any signal which your browser might transmit through the so-called 'Do Not Track' feature your browser might have. If you wish to disable cookies on our Websites, you should not rely on any 'Do Not Track' feature your browser might have.

## 8. Interest-based Advertising

On some of our Websites, we may work with third-party ad networks, analytics companies, measurement services and others (“third-party ad companies”) to display advertising on our Websites and to manage our advertising on third-party sites, mobile apps and online services. We and these third-party ad companies may use cookies, pixels tags and other tools to collect information on our Websites (and on third-party sites and services), such as browsing history, IP address, device ID, cookie and advertising IDs, and other identifiers, general location information and, with your consent, your device’s geolocation information; we and these third-party ad companies use this information to provide you more relevant ads and content and to evaluate the success of such ads and content.

You may also obtain more information about targeted or “interest-based advertising” and opt-out of many ad networks at the industry Websites below:

- Canada: [www.youradchoices.ca](http://www.youradchoices.ca)
- EU: [www.youronlinechoices.eu](http://www.youronlinechoices.eu)
- U.S.: [www.aboutads.info](http://www.aboutads.info)

## 9. Security

Innovisk has implemented technical and organizational security measures to protect the personal information we collect. Despite this, the security of the transmission of information via the Internet cannot always be guaranteed and you acknowledge this in your access and use of our Website. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "Contact & Comments" section below.

## 10. Individual Rights and Choices

**Marketing.** You may opt out from receiving marketing-related communications from us on a going-forward basis by contacting us or by using the unsubscribe mechanism contained in each email. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt out.

**Access, amendment and deletion.** You may request to review, make amendments, have deleted or otherwise exercise your rights, under applicable privacy laws, over your personal information that we hold, subject to certain limitations under applicable law. You may submit a request to us related to your personal information by emailing us at [privacy@innovisk.com](mailto:privacy@innovisk.com).

We take steps in accordance with applicable legislation to keep your personal information accurate, complete and up-to-date. If you would like to review, correct, update, suppress, or restrict the processing of your personal information or request a copy of personal information about you, you may contact us by sending us an email at [privacy@innovisk.com](mailto:privacy@innovisk.com) or sending your request by postal mail to the address provided in the [Contact & Comments](#) section below.

In your request, please make clear what personal information you would like to have changed, whether you would like to have your personal information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your personal information. For your protection, we may only implement requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

To exercise your rights please contact us using the contact information below. Subject to legal and other permissible considerations, we will make reasonable efforts to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

**Additional information for certain jurisdictions.** Innovisk is committed to respecting the privacy rights of individuals under all privacy laws applicable to us. Some privacy laws require that we provide specific information about individual rights to applicable consumers, which we have set forth at the end of this Notice:

- **California:** if you are a California resident, you have certain rights, under California privacy laws, regarding your personal information as set forth below, in the [Additional Information for Certain Jurisdictions](#) section.
- **EU/EEA:** if you are in the European Union / European Economic Area, please go to the [Additional Information for Certain Jurisdictions](#) below for details about your rights under the GDPR.

## 11. Retention Period

We will retain your personal information for the period necessary to fulfill the purposes outlined in this privacy notice unless a longer retention period is required or permitted by law. We may retain personal information for longer where required by our regulatory obligations, professional indemnity obligations or where we believe it is necessary to establish, defend or protect our legal rights and interests or those of others. With respect to the data and files we handle as a processor, we retain this personal information in accordance with our clients' instructions.

## 12. Children and Minors

The Websites and Services are not directed to individuals under the age of sixteen (16), and we do not knowingly collect personal information from minors under the age of 16.

## 13. Changes to our Privacy Notice

From time to time, we may change our Privacy Notice. The effective date set forth at the indicates the last time this Privacy Notice was revised. Checking this effective date allows you to determine whether there have been changes since the last time you reviewed the notice. We will notify you of changes to this privacy notice by posting the revised privacy notice on our Website.

## 14. Contact and Comments

If you have any questions or comments regarding this privacy notice, please contact our Global Risk and Controls Manager, 34 Lime Street, Langbourn, London EC3M 7AT, UK or at [privacy@innovisk.com](mailto:privacy@innovisk.com).

## 15. Additional Information for Residents in Certain Jurisdictions

In this section, we set forth additional information, as required under applicable privacy laws in certain jurisdictions.

### A. California Residents

In this section, we provide information for California residents, as required under California privacy laws, including the CCPA, which requires that we provide California residents certain specific information about how handle their personal information, whether collected online or offline. This section does not address or apply to our handling of:

- publicly available information made lawfully available by state or federal governments
- personal information that is subject to an exemption under Section 1798.145(c) – (f) of the CCPA (such as protected health information that is subject to HIPAA or the California Medical Information Act, and non-public information subject to the Gramm-Leach Bliley Act or the California Financial Information Privacy Act)
- personal information we collect about job applicants, independent contractors, or current or former full-time, part-time and temporary employees and staff, officers, directors or owners of Innovisk
- personal information about individuals acting for or on behalf of another company, to the extent the information relates to our transactions with such company, products or services that we receive from or provide to such company, or associated communications or transactions (accept that such individuals have the right to opt-out of any sale of their personal information and to not be subject to any discrimination for exercising such right)

**Categories of personal information that we collect and disclose.** Our collection, use and disclosure of personal information about a California resident will vary depending upon the circumstances and nature of our interactions or relationship with such resident. The table [above](#) sets out generally the categories of personal information (as defined by the CCPA) about California residents that we collect, sell, and disclose to others for a business purpose. We collect these categories of personal information from the sources described in the [Personal Information Collected](#) section above, and for the purposes described in the [Purposes and Legal Bases for Processing Personal Information](#) section above.

**Rights of California residents.** California law grants California residents certain rights and imposes restrictions on particular business practices as set forth below.

- **Do-Not-Sell:** California residents have the right to opt-out of our sale of their personal information. Opt-out rights, if applicable, can be exercised by clicking the Do Not Sell My Information link in the footer of our [website homepage](#). We do not sell personal information.
- **Initial Notice:** We are required to notify California residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used.
- **Request to Delete:** California residents have the right to request deletion of their personal information that we have collected about them and to have such personal information deleted,

except where an exemption applies. We will respond to verifiable requests received from California residents as required by law. The instructions for submitting a verifiable Request to Delete are described in the “Submitting Requests” section below.

- **Request to Know:** California residents have the right to request and, subject to certain exemptions, receive a copy of the specific pieces of personal information that we have collected, used, disclosed and sold about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance. California residents also have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including the:
  - categories of personal information collected;
  - categories of sources of personal information;
  - business and/or commercial purposes for collecting and selling their personal information;
  - categories of third parties/with whom we have shared their personal information;
  - categories of personal information that we have sold in the preceding 12 months, and for each category identified, the categories of third parties to which we sold that particular category of information; and
  - categories of personal information shared for a business purpose in the preceding 12 months, and for each category identified, the categories of third-parties to which we disclosed that particular category of personal information;

California residents may make a Request to Know up to twice every 12 months. We will respond to verifiable requests received from California residents as required by law. The instructions for submitting a verifiable Request to Know are described in the “Submitting Requests” section below.

- **Right to non-discrimination:** The CCPA prohibits discrimination against California residents for exercising their rights under the CCPA. Discrimination may exist where a business denies or provides a different level or quality of goods or services, or charges (or suggests that it will charge) different prices, rates, or penalties on residents who exercise their CCPA rights, unless doing so is reasonably related to the value provided to the business by the residents’ data.
- **Financial incentives:** A business may offer financial incentives for the collection, sale or deletion of California residents’ personal information, where the incentive is not unjust, unreasonable, coercive or usurious, and is made available in compliance with applicable transparency, informed consent, and opt-out requirements. California residents have the right to be notified of any financial incentives offers and their material terms, the right to opt-out of such incentives at any time, and may not be included in such incentives without their prior informed opt-in consent. We do not offer any such incentives at this time.

**Submitting Requests.** Do-Not-Sell (Opt-out) Requests, Requests to Know, and Requests to Delete may be submitted by emailing us at [privacy@innovisk.com](mailto:privacy@innovisk.com) or telephoning us, toll free, at 1-877-992-8258.

We will use the following process to verify Requests to Know and Requests to Delete: We will acknowledge receipt of your Consumer Request, verify it using processes required by law, then process and respond to your request as required by law. To verify such requests, we may ask you to provide the following information:

- For a request to know categories of personal information which we collect, we will verify your identity to a reasonable degree of certainty by matching at least two data points provided by you against information in our systems which are considered reasonably reliable for the purposes of verifying a consumer's identity.
- For a request to know specific pieces of personal information or for requests to delete, we will verify your identity to a high degree of certainty by matching at least three pieces of personal information provided by you to personal information maintained in our systems and also by obtaining a signed declaration under penalty of perjury that the requestor is the consumer whose personal information is the subject of the request.

An authorized agent can make a request on a California residents' behalf by providing a power of attorney valid under California law, or providing: (1) proof that the consumer authorized the agent to do so; (2) verification of their own identity with respect to a right to know categories, right to know specific pieces of personal information, or requests to delete which are outlined above; and (3) direct confirmation that the consumer provided the authorized agent permission to submit the request.

We will respond to verifiable requests received from California residents as required by law. For more information about our privacy practices, you may contact us as set forth in the [Contact and Comments](#) section above.

## B. European Union / European Economic Area

Residents of the European Union (EU) and the European Economic Area (EEA) have the following rights, under the GDPR, regarding their personal information:

- **Right of access:** You have the right to obtain from us confirmation as to whether or not personal information concerning you is being processed, and where that is the case, to request access to the personal information. The accessed information includes – among others - the purposes of the processing, the categories of personal information concerned, and the recipients or categories of recipient to whom the personal information have been or will be disclosed. You have the right to obtain a copy of the personal information undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.
- **Right to rectify and complete personal information:** you can request the rectification of inaccurate data and the completion of incomplete data. We will inform relevant third parties to whom we have transferred your data about the rectification and completion if we are legally obliged to do so.
- **Right to erasure (right to be forgotten):** You have the right to obtain from us the erasure of personal information concerning you in limited circumstances where:
  - it is no longer needed for the purposes for which it was collected; or
  - you have withdrawn your consent (where the data processing was based on consent); or
  - following a successful right to object; or
  - it has been processed unlawfully; or
  - the data has to be erased in order to comply with a legal obligation to which Innovisk is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary for:

- compliance with a legal obligation; or
  - the establishment, exercise or defense of legal claims.
- **Right to restriction of processing:** You have the right to obtain from us restriction of processing your personal information. In this case, the respective data will be marked and only be processed by us for certain purposes. This right can only be exercised where:
    - the accuracy of your personal information is contested, to allow us to verify its accuracy; or
    - the processing is unlawful, but you do not want the personal information erased; or
    - it is no longer needed for the purposes for which it was collected, but you still need it to establish, exercise or defend legal claims; or
    - you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
  - to establish, exercise or defend legal claims; or
  - to protect the rights of another natural or legal person.
- **Right to data portability:** You have the right to receive the personal information concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to another entity without hindrance from us, but in each case only where the processing is (a) based on your consent or on the performance of a contract with you, and (b) also carried out by automated means.

- **Right to object:** You have the right to object at any time to any processing of your personal information which has our legitimate interests as its legal basis. You may exercise this right without incurring any costs. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms. The right to object does not exist, in particular, if the processing of your personal information is necessary to take steps prior to entering into a contract or to perform a contract already concluded.
- **Right to object to our use of your personal information for direct marketing purposes:** You can request that we change the manner in which we contact you for marketing purposes. You can request that we do not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

- **Right to withdraw consent:** if you have given us your consent for the processing of your personal information, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to obtain a copy of safeguards:** you can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside the EU/EEA. We may redact data transfer agreements to protect commercial terms.

- ***Right to lodge a complaint with your local supervisory authority:*** You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information. We ask that you please attempt to resolve any issue with us first, although you have a right to contact your supervisory authority at any time.