

Dazz Privacy Policy

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1) INTRODUCTION

This privacy policy (“**Privacy Policy**”) describes how we, Dazz, Inc. and our affiliates (“**we**”, “**our**” or “**us**”) process, use, collect and store Personal Information (defined below) that we receive from or about you (“**you**”) in connection with your use of the Dazz website and our service offerings (collectively referred to herein as the “**Services**”). Please read this Privacy Policy carefully, so you can fully understand our practices in relation to your Personal Information. **Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.**

In situations where Dazz is providing Services to our customer where the entity customer has entered into an agreement for use of the services with Dazz, Dazz is the processor/service provider (a provider that processes personal data on behalf of or at the direction of a controller, or other similar designation under the law) and the entity customer is the controller/business (the entity that decides how and why information is processed) of the information provided to Dazz via use of the Services. In such situations, our processing of your Personal Information may also be subject to an applicable data processing agreement with our customer. In the event of a conflict between the data processing agreement and this Privacy Policy, the data processing agreement governs.

“**Personal Information**” and/or “**Personal Data**” mean any information that can be used, alone or together with other data, to uniquely identify any living human being and any information deemed as Personally Identifiable Information by applicable privacy laws.

Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, some jurisdictions require that we provide you with the "legal basis" for processing your Personal Information, and we have included this information below.

We may update this Privacy Policy from time to time and therefore we ask you to check back periodically for the latest version. If we implement any significant changes to the use of your Personal Information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our website or by other means in accordance with applicable legal requirements.

2) TERMS OF USE

This Privacy Policy forms part of our Website Terms of Use (“**Terms**”). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms.

3) WHAT PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

a) When you browse or visit our Website (<https://www.dazz.io/>)

- *Personal Data we collect:* We may use analytics tools, cookies and log files on our Website which may collect information such as IP address, pages clicked, search and browser history, and device information. For more information about our use of cookies, please read our Cookies Policy.
- *For what purposes:* We use this information to analyze trends and behavior, maintain and improve the Website and our Services and marketing and promotional efforts. We may disclose this information to third party platforms.
- *Legal basis:*
 - Consent (e.g., non-essential cookies, to the extent required under applicable law)
 - Legitimate interest (e.g., essential cookies for the Website to work, marketing)
- *Consequences of not providing the Personal Data:* Certain Website features may not be available and we may not be able to analyze usage of our Website or use the Personal Data for the purposes explained.

b) When you request a demo or trial and during the trial period

- *Personal Data we collect:* Full name, business email address, job title, company, business address, telephone number, country, any other Personal Data that you decide to provide us with. We may also record the demo and/or follow up sessions for the purposes of business intelligence and improving our Services.
- *For what purposes:*
 - To provide you with a demo
 - To send you marketing communications
- *Legal basis:*
 - Performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering a contract i.e. subscription agreement
 - Legitimate interest (to provide you with a demo or trial, marketing)
 - Consent (for marketing, if required under applicable law)
- *Consequences of not providing the Personal Data:* We cannot provide you a demo or send you marketing communications

c) When you subscribe for our blog or newsletter, status page or to receive updates to our sub-processor list

- *Personal Data we collect:* Full name, business email address
- *For what purposes:* To send you communications for which you have subscribed you have and other marketing communications
- *Legal basis:*
 - Legitimate interest (to provide you with access to our blog or newsletters, marketing or updates which you have subscribed to)
 - Consent (for marketing, if required under applicable law)
- *Consequences of not providing the Personal Data:* We cannot send you such communications

d) When you contact us

- *Personal Data we collect:* Full name, business email address, company, job title, work telephone number, country, message (to the extent it includes personal data) and any other Personal Data that you decide to provide us with
- *For what purposes:*
 - To answer your questions
 - To send you marketing communications
- *Legal basis:*
 - Performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering a contract i.e. subscription agreement
 - Legitimate interest (e.g., to answer your questions, marketing)
 - Consent (for marketing, if required under applicable law)
- *Consequences of not providing the Personal Data:* We cannot answer your questions or send you marketing

e) When you apply for a job with us

- *Personal Data we collect:* Full name, email address, any personal data contained in your resume (c.v.), your responses to any assessment, background check results (in accordance with applicable law), any other Personal Data that you decide or agree to provide us with such as if you agree for your interview or assessment to be recorded. Please note that, in most cases, we receive the information directly from you, but we may also receive information from recruitment companies, references or background check companies.
- *For what purposes:* To assess you as a candidate, review and examine your job application and communicate with you regarding your application.
- *Legal basis:*
 - Performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract i.e. employment contract
 - Legitimate interest (to assess you as a candidate, recruitment)
- *Consequences of not providing the Personal Data:* We cannot process your application or communicate with you

f) When you provide us with your personal data for marketing reasons (e.g. when you attend a physical or virtual marketing event or webinar, and/or provide us with your business card)

- *Personal Data we collect:* Full name, business email address, job title, company, address, telephone number, country, any other Personal Data that you decide to provide us with
- *For what purposes:* To establish a business relationship with you, contact you about Dazz's services and send you marketing communications
- *Legal basis:*
 - Legitimate interest (e.g. marketing)
 - Consent (for marketing, if required under applicable law)
- *Consequences of not providing the Personal Data:* We cannot establish a business connection or send you marketing communications.

g) When we acquire your Personal Data from third-party sources for marketing (e.g. lead-generation companies or as part of marketing campaigns)

- *Personal Data we collect:* Full name, business email address, job title, company, address, telephone number, country
- *For what purposes:* To contact you regarding Dazz's services and send you marketing communications

- *Legal basis:*
 - Legitimate interest (marketing)
 - Consent (for marketing, if required under applicable law)
- *Consequences of not providing the Personal Data:* We cannot contact you regarding Dazz's services and send you marketing communications

h) When we use the Personal Data of our customers/end-users (e.g. when we communicate with customers, when you log-in to and use our online products and services ("Services"))

- *Personal Data we collect directly from you or from your employer who provides us with your contact details:* Full name, business email address, Dazz password (if you have a Dazz account), job title, role, company, address, telephone number, country and any other Personal Data that you decide to provide us with e.g. any feedback you provide.
- *Personal Data we collect automatically when you use our services:* When you access or use the Services we automatically collect information about you, including data relating to you use of our services e.g. pages visited, IP address and browser information, access times.
- *For what purposes:*
 - To allow you to register for and log-in to our Services
 - To provide our Services and perform our agreements with our customers
 - For billing and account management
 - To provide support (e.g. ticketing and chat function)
 - To monitor our Services
 - To collect analytics information on use of the Services
 - For security purposes, including for user authentication, logging and debugging and to prevent system abuse
 - To maintain and improve our Services
 - To communicate with you and allow you to provide feedback on our Services
 - To send you marketing communications
- *Legal basis:*
 - Performance of a contract to which the customer is a party
 - Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.)
 - Legitimate interest (to provide and improve our Services, send contract-related communications, marketing or updates about features or services)
 - Consent (for marketing, if required under applicable law)
- *Consequences of not providing the Personal Data:* We cannot perform our obligations, provide the Services, or communicate with you.

i) When you apply to be a Dazz partner / integrate with Dazz

- *Personal Data we collect:* Full name, job title,/function, business email address, business telephone number, country of residence, company name, any other Personal Data that you decide to provide us with.
- *For what purposes:*
 - To enable your company to become a Dazz partner / integrate with Dazz
 - To communicate with you
 - To comply with our legal obligations and record keeping
 - To send you marketing communications
- *Legal basis:*
 - Performance of a contract to which the partner is a party (partner / integration agreement)
 - Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.)
 - Legitimate interest (to send you contract-related communications, to perform our agreement with your employer)
- *Consequences of not providing the Personal Data:* You cannot become a Dazz partner / integrate with Dazz

j) When we use the Personal Data of our service providers or distributors

- *Personal Data we collect:* Full name, business email address, job title, company, business address, telephone number, country, payment information, any other Personal Data that you decide to provide us with
- *For what purposes:*
 - To perform our agreement with you
 - To communicate with you
 - To comply with our legal obligations and record keeping
- *Legal basis:*
 - Performance of a contract to which the service provider or distributor is a party
 - Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.)
 - Legitimate interest (to send you contract-related communications, to perform our agreement with your employer)
- *Consequences of not providing the Personal Data:* We cannot perform the agreement with you or communicate with you

k) When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

- *Personal Data we collect:* Full name, business email address, job title, company, telephone number, any other Personal Data you provide us
- *For what purposes:* To respond to your requests, establish a business relationship and send you marketing communications
- *Legal basis:*
 - Legitimate interest (responding to your request, marketing, and business development)
 - Consent (for marketing, if required under applicable law)
- *Consequences of not providing the Personal Data:* We can't respond to your requests, establish and business relationship and send you marketing communications

l) When we undertake social media marketing, including via use of audiences or list-based advertising

- *Personal Data we collect or receive for these purposes:* Full name, business email address, job title, company, telephone number, IP address, pages clicked, search and browser history, device information and any other Personal Data you or third parties provide us
- *For what purposes:* We may use your Personal Information to contact you via social media platforms in order to establish a business relationship with you and contact you about Dazz's services. We may also use your Personal Information in order to create lists of individuals that we would like to target advertising about our products and services to via social media channels, including via direct messaging marketing solutions. You may be included in such a list (in which case you will see advertising related to Dazz when you visit those social media platforms) or we may use your Personal Information to ask social media platforms to identify a list of other individuals who we think will be interested in our products, so that those individuals can be presented with advertising about Dazz.
- *Legal basis:*
 - Legitimate interest (marketing, advertising and business development)
 - Consent (if required by applicable law)
- *Consequences of not providing the Personal Data:* We can't establish a business relationship with you via social media platforms; you will be excluded from advertising and marketing campaigns on social media platforms.

N.B. Please note that social media platforms may set cookies and other tracking technologies on your device when you visit their pages and when you navigate from their pages. The output of such information may be provided to us (usually for statistical purposes to see how users interact with our content on social media platforms). The social media platforms are responsible for how they handle your Personal Information and information about how these social media platforms collect and use your Personal

Information (and how they use cookies and other technologies, including instructions on how you can disable these) can usually be found in their respective privacy policies and cookies policies on their websites.

Finally, please note that some of the abovementioned Personal Information may be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Information may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims.

In certain cases, we may or will anonymize or de-identify your Personal Information and further use it for internal and external purposes, including, without limitation, to improve our services and for research and development purposes. “Anonymous Information” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

4) HOW WE DISCLOSE YOUR PERSONAL INFORMATION

Depending on the context described above, we may disclose your Personal Data to the following categories of third parties:

- Hosting/ storage
- Email system provider
- Authentication
- Support and ticketing
- Logging and monitoring
- Marketing
- Event sponsors
- CRM
- Data enrichment
- E-mail verification
- Sales Engagement
- Sales automation
- Analytics and business intelligence
- Document management / automation
- Conducting background checks (if you are applying for a job with us)
- Automation / management of HR and job application process
- Other service providers to the extent required to fulfil the purposes listed above

We may also disclose your Personal Data as follows:

- a) to the extent necessary in our good faith determination, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- b) with our business partners with whom we jointly offer products or services;
- c) with our affiliated companies to the extent necessary to fulfil the purposes listed above;
- d) if, in the future, we sell or transfer some or all of our business, shares, or assets to a third party, we may disclose information to a potential or actual third party purchaser of our business, shares or assets. In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Information in connection with the foregoing events;
- e) with social media platforms for the purposes mentioned above; where you have provided your consent to us disclosing or transferring the Personal Information.

5) HOW WE PROTECT AND STORE YOUR INFORMATION

- a) Security. We have implemented appropriate technical, organizational and security measures designed to protect your Personal Information. However, please note that we cannot guarantee that the information will not be compromised including as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- b) Retention of your Personal Information. We may store your Personal Information for as long as necessary to fulfil the purpose for which we collected it, and as long as necessary to fulfill your requests or inquiries or provide services or until we proactively delete it or you send a valid deletion request. In addition, in some circumstances we may store your Personal Information for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Information or dealings. We have an internal data retention policy to ensure that we do not retain your Personal Data perpetually. Regarding retention of cookies, you can read more in our Cookies Policy.

6) ADDITIONAL INFORMATION REGARDING TRANSFERS OF GDPR PROTECTED PERSONAL DATA

Internal transfers: Transfers within the Dazz group will be covered by an internal data processing agreement between entities of the Dazz group which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to.

External transfers: When Dazz engages in transfers of GDPR and UK GDPR protected Personal Data outside of the EEA or UK (for example to third party service providers for the purposes listed above), we generally rely on either: (i) Adequacy Decisions adopted by the European Commission under Article 45 of the GDPR (for example, when our team accesses Personal Data from Israel); (ii) the Standard Contractual Clauses issued by the European Commission or the United Kingdom (as updated from time to time); or (iii) another lawful transfer mechanism provided for under the GDPR e.g. Binding Corporate Rules. Dazz also monitors the circumstances surrounding such transfers to ensure that Personal Data continues to be afforded a level of protection that is essentially equivalent to the one guaranteed by the GDPR and UK GDPR.

7) YOUR PRIVACY RIGHTS

- a. Rights: The following rights (which may be subject to certain exemptions or derogations) may apply to certain individuals depending on their jurisdiction of residence. The rights that may be applicable to you are as follows:
 - You have a right to access Personal Data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
 - You have the right to request that we rectify any Personal Data we hold that is inaccurate or misleading;
 - You have the right to request the erasure/deletion of your Personal Data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your Personal Data, for example for the establishment, exercise or defense of legal claims;
 - You have the right to object, to or to request restriction, of the processing;
 - You have the right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
 - You have the right to object to profiling, if applicable;

- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
 - You also have a right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area or the United Kingdom, as applicable, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
 - You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.
- b. To the extent privacy laws applicable to you afford you with the rights referenced above, we will respect your rights and comply with such laws. You can exercise your rights by contacting us at privacy@dazz.io. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request.
- c. **Notice of Right to Opt Out of Sales of Personal Information and Sharing/Processing of Personal Information for Targeted Advertising Purposes.** Certain U.S. states provide residents with the ability to opt out of the "sale" of their Personal Information or the "sharing/processing" of their Personal Information for online targeted advertising purposes. As discussed above in Section 3, we may engage in certain online advertising activities through social media and by re-targeting advertising for our Services on other websites. We may use third-party ad networks to assist in these activities, which involves their collection of cookie and device identifier information to perform these activities. Under certain U.S. state laws you have the right to opt out of these activities. If you would like to opt out of our online disclosure such as through cookie and pixel technology of your Personal Information for purposes that could be considered "sales" or "sharing" for purposes of targeted advertising, please send a request via email to privacy@dazz.io. You can also submit a request to opt out of our offline disclosures of Personal Information that are subject to applicable opt out rights by sending a request via email to privacy@dazz.io.
- d. To help protect the security of your Personal Data, Dazz will verify your identity in connection with any requests. We also take steps to ensure that only you or your authorized representative can exercise rights with respect to your information. If you are an authorized agent making a request, we may require and request additional information to protect the Personal Data entrusted to Dazz, including information to verify that you are authorized to make that request. There may be situations where we cannot grant your request, for example, in the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
- e. We will not discriminate against you (e.g., by restricting or denying you access to our Services) because of choices and requests you make in connection with your Personal Data. Please note, certain choices may affect our ability to deliver the Dazz Services. For example, if you sign up to receive marketing communications by email, then ask Dazz to delete all of your information, we will be unable to send you marketing communications. You may exercise any of your rights in relation to your Personal information by contacting us using the details provided under the "CONTACT US" section below.

USE BY CHILDREN

We do not offer our products or services for use by children and, therefore, we do not knowingly collect personal information from, and/or about children under the age of eighteen (18). If you are under 18, you may not use the Website, or provide any information to the Website without involvement of a parent or a guardian. In the event that we become aware that you provide personal Information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@dazz.io.

LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS

Our Website or Services may enable you to interact with or contain links to your third party accounts and other third party websites mobile software applications and products or services that are not owned or controlled by us (each a “Third Party Service”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service that you choose to use or interact with.

10) DO NOT TRACK NOTICE

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not currently respond to or honor DNT signals.

Please refer to our Cookies Policy for information about cookies and other tracking tools Dazz uses on our Website.

11) PRIVACY INFORMATION FOR CALIFORNIA RESIDENTS

If you are a California resident, the California Consumer Privacy Act (“CCPA”) requires us to provide you with the following additional information about: (1) the purpose for which we use each category of “personal information” (as defined in the CCPA) we collect; and (2) the categories of third parties to which we (a) disclose such personal information for a business purpose, (b) “share” personal information for “cross-context behavioral advertising,” and/or (c) “sell” such personal information. Under the CCPA, “sharing” is defined as the targeting of advertising to a consumer based on that consumer’s personal information obtained from the consumer’s activity across websites, and “selling” is defined as the disclosure of personal information to third parties in exchange for monetary or other valuable consideration. Please see the “What Personal Information we collect and how we use it” and the “How we disclose your Personal Information” sections above in our Privacy Policy for detailed information about our data collection and use practices, as well as for more information about our advertising practices. The following chart details the categories of Personal Information that we sell/share with third parties:

<u>Category of Personal Information</u>	<u>Categories of Third Parties to Which We Sell/Share this Category of Personal Information</u>
Device identifiers and Service usage information	Ad networks and advertising analytics partners
Email address	Ad networks and advertising analytics partners

Your Choices Regarding “Sharing” and “Selling”: You have the right to opt out of our sale/sharing of your personal information for purposes of online advertising by sending a request via email to privacy@dazz.io. To opt out of the offline disclosure of your personal information to third parties for these purposes, please send us a request via email to privacy@dazz.io. Please note that there may be circumstances in which we are entitled by law to continue to sell or share your data. Also note that your withdrawal of consent shall not affect our right to request your consent to such sell or share again after twelve (12) months.

Other CCPA Rights. If we ever offer any financial incentives in exchange for your personal information, we will provide you with appropriate information about such incentives. The CCPA also allows you to limit the use or disclosure of your “sensitive personal information” (as defined in the CCPA) if your sensitive personal information is used for certain purposes. Please note that we do not use or disclose sensitive personal information other than for business purposes for which you cannot opt out under the CCPA. Please see Section 7 of the Privacy Policy, “Your Privacy Rights,” for information about the additional rights you have with respect to your personal information under California law and how to exercise them.

California “Shine the Light” disclosure. The California “Shine the Light” law gives residents of California the right under certain circumstances to opt out of the disclosure of certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes, or in the alternative, that

we provide a cost-free means for consumers to opt out of any such disclosure. For more information about our compliance under the Shine the Light law please contact us via privacy@dazz.io.

12) CONTACT US

If you have any questions regarding this notice, or if you wish to exercise your rights, we encourage you to contact us at privacy@dazz.io.