

Kalibrate - Privacy and cookies policy

Version 2.0

Updated on March 13, 2023

Introduction

KALIBRATE respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website or when we access your personal data through our vendors, partners and customers.

This privacy notice is provided in a layered format, so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

- Important information and who we are
- The data we collect about you
- How is your personal data collected
- How we use your personal data
- Information about our use of cookies
- Disclosures of your personal data
- International transfers
- Data security
- Data retention
- Your legal rights
- Additional information about processing of personal data in USA
- Glossary

1. Important information and who we are

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how KALIBRATE collects and processes your personal data through your use of this website, including any data you may provide through this website when you submit a form, or when KALIBRATE is entrusted with your personal data from our vendors, partners or customers.

This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Kalibrate Group is made up of different legal entities. This privacy notice is issued on behalf of the Kalibrate Group so when we mention “Kalibrate”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the Kalibrate Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us.

Kalibrate Technologies Ltd is the controller and responsible for the website www.kalibrate.com

eSite Analytics Inc. is the controller and responsible for the website www.esiteanalytics.com

Intalytics Inc. is the controller and responsible for the website www.intalytics.com

Kalibrate’s relevant legal entity is the controller or the processor (as the case maybe) of the personal data accessed through its contracted vendors, partners or customers.

If you have any questions about this privacy notice, please contact us using the details set out below. For Data Subject Access Request (DSAR), please contact us at privacy@kalibrate.com

CONTACT DETAILS

Data Privacy Manager

Kalibrate Technologies

Suite 213, No.2 Circle Square, 1 Symphony Park, Manchester, M1 7FS

privacy@kalibrate.com

EU Representative:

Kalibrate takes the protection of personal data seriously and has appointed DataRep as its Data Protection Representative in the European Union so that you can contact them directly in your home country. DataRep is a company incorporated in Ireland, with its registered address as Data Protection Representative Limited, 12 Northbrook Road, Dublin, D06 E8W5, Ireland.

If you want to raise a question to Kalibrate or otherwise exercise your rights in respect of your personal data, you may do so by:

Sending an email to DataRep at datarequest@datarep.com quoting “Kalibrate Technology Limited” in the subject line;

Contacting DataRep via online webform at: www.datarep.com/data-request; or

Mailing your inquiry to DataRep at the most convenient addresses listed at the bottom of this document.

PLEASE NOTE WHEN MAILING INQUIRIES, IT IS ESSENTIAL TO MARK YOUR LETTERS FOR “DATAREP” AND NOT KALIBRATE OR THE LETTER MAY NOT REACH OUR EU REPRESENTATIVE.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on date stated above.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Identity Data includes first name, last name, username or similar identifier, job, company name, company size, city, country.

Contact Data includes email address and telephone numbers.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Profile Data includes your username and password, your interests, preferences, feedback and survey responses. This may also include the information you have provided to us in your curriculum vitae and covering letter through the website.

Usage Data includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Data we receive from third parties: We receive personal information from our clients and vendors. This may include demographics, as well as transaction information and other behavioural attributes. We may combine personal information with other sources of personal information in jurisdictions where it is legally permitted.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel your request or service you have with us, but we will notify you if this is the case at that time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and Contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- submit your CV / résumé to our recruitment team;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy (section 5 below) for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google
- (b) marketing platforms such as HubSpot

Data from companies you do business with which are our customers, each having collected your data in accordance with their respective privacy policies, and each providing that data to Kalibrate for analysis and/or processing on their behalf.

Data from companies who have aggregated data from publicly available sources and/or from commercial sources (such as when you provide data to a company which has the right to share or resell that information).

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to perform the contract with our vendors, partners or customers (when your personal data is provided to Kalibrate by such parties).

Where we need to comply with a legal or regulatory obligation.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enable you to download Kalibrate reports, partake in a competition, or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of your Contract or your request (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop those products/services, and grow our business)
To administer and protect our business and the website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how customers use our products/services, to develop those

understand the effectiveness of the advertising we serve to you	(d) Usage (e) Marketing and Communications (f) Technical	products/services, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To process and manage your feedback/comments/enquires on our product/services/organisation/employment opportunities	a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to manage your feedback/comments/enquires)
To manage recruitment-related processes	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	a) Performance of your request (b) Necessary for our legitimate interests (to analyse your profile and contact you as part of recruitment)
To provide services to our customers	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (provision of services to our customers and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you downloaded a report, entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We (or our vendors, partners and customers) will get your express opt-in consent before we share your personal data with any company outside Kalibrate group of companies for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

RECRUITMENT

If you submit a resume or job application online, we will use your personal data for recruitment-related purposes, which may include contacting you via email, telephone, or post. In some cases, you may be required to register on our website in order that you may track the progress of your application online. Except where you request otherwise, Kalibrate may keep your personal data on file for an appropriate time in order to consider you for other employment opportunities with Kalibrate in the future. If you are providing personal information about an individual other than yourself (such as a referred candidate), you must obtain the consent of the individual before submitting any of their personal information. It is generally not our intention to seek sensitive information (for example, data relating to race or ethnic origin, religious or other similar beliefs, political opinions, criminal record, physical or mental health or sexual life/orientation) as part of our recruitment process or recruitment related activities. However, we might gather sensitive information about you because you voluntarily provide the information to us, or we are required to collect the information as a result of legal requirements imposed on us. If we do receive any sensitive information about you, we will, where necessary, obtain your explicit consent to collect and use such information in accordance with applicable laws. Should you be hired by a Kalibrate entity, your personal information may be used in connection with the employer-employee relationship as permitted by applicable laws.

5. Information about our use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	Vendor	Purpose	Category
AWSELB	Amazon	AWS Elastic Load Balancer	Performance
__utma	Google	Google Analytics	Targeting
__utmb	Google	Google Analytics	Targeting
__utmc	Google	Google Analytics	Targeting
__utmz	Google	Google Analytics	Targeting
_gauges_unique_hour	Gauges	Gauges Analytics	Performance
_gauges_unique_day	Gauges	Gauges Analytics	Performance
_gauges_unique_month	Gauges	Gauges Analytics	Performance
_gauges_unique_year	Gauges	Gauges Analytics	Performance
_gauges_unique	Gauges	Gauges Analytics	Performance
apex__product	SalesForce	SalesForce Analytics	Strictly Necessary
__hstc	HubSpot	HubSpot Analytics	Targeting
__hssrc	HubSpot	HubSpot Analytics	Targeting
__hssc	HubSpot	HubSpot Analytics	Targeting

hsPagesViewedThisSession	HubSpot	HubSpot Analytics	Strictly Necessary
hubspotutk	HubSpot	HubSpot Analytics	Strictly Necessary
hubspot.hub.id	HubSpot	HubSpot Authentication	Strictly Necessary
hubspotauth	HubSpot	HubSpot Authentication	Strictly Necessary
hubspotauthcms	HubSpot	HubSpot Authentication	Strictly Necessary
hubspotauthremember	HubSpot	HubSpot Authentication	Functionality
_hs_opt_out	HubSpot	Opt out of HubSpot tracking	Targeting
Hubspotutktzo	HubSpot	Time Zone Offset	Functionality
__hfluid	HubSpot	In-app usage tracking	Targeting
mp_id_mixpanel	Mixpanel	In-app usage tracking	Targeting
messagesUtk	HubSpot	Track visitors using messages	Targeting
hs-messages-is-open	HubSpot	Live chat	Functionality
hs-messages-hide-welcome-message	HubSpot	Live chat	Functionality

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

6. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Internal Third Parties as set out in the Glossary.

External Third Parties as set out in the Glossary.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers (under UK GDPR and EU GDPR)

We may share your personal data within the Kalibrate Group. This may involve transferring your data outside the United Kingdom (UK) and/or the European Economic Area (EEA).

Many of our external third parties are based outside the UK or EEA so their processing of your personal data will involve a transfer of data outside the UK or EEA.

Whenever we transfer your personal data out of the UK or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK.

Where we use certain service providers, we may use specific contracts approved for use by the UK which give personal data the same protection it has in the UK.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

HOW LONG WILL YOU USE MY PERSONAL DATA?

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click here to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us at privacy@kalibrate.com

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. Additional information about processing of personal data in USA

Data broker

Kalibrate's US affiliates Intalytics Inc. and eSite Analytics Inc. are registered data brokers in the State of California and the State of Vermont and procures personal data from third party data vendors for providing data or analytics services to their clients ("Sourced Data"). They may disclose or distribute Sourced Data as permitted by respective data vendors.

Rights under California Consumer Privacy Act (CCPA)

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our visitors who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

CCPA Privacy Notice

The California Code of Regulations defines a “resident” as: (1) every individual who is in the State of California for other than a temporary or transitory purpose and (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose. All other individuals are defined as “non-residents.” If this definition of “resident” applies to you, certain rights and obligations apply regarding your personal information.

What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category Examples Collected

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account	YES
B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment	YES
C. Protected classification characteristics under California or federal law	Date of Birth	YES
D. Commercial information	Transaction information, purchase history, financial details and payment information	YES
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements	YES
G. Geolocation data	Device location	YES
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply for a job with us	YES
J. Education	Student records and directory information	NO
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics	YES

We may also collect other personal information outside of these categories in instances where you interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels
- Participation in customer surveys; and
- Facilitation in the delivery of our Services and to respond to your inquiries

If you are a U.S. resident, we may process your information categorised as protected health information under the U.S. Health Insurance Portability and Accountability Act (HIPAA) or the U.S. Health Information Technology for Economic and Clinical Health Act (HITECH) if (a) you have provided personal data to a covered entity as defined under HIPAA or HITECH, (b) that covered entity is one of our partners or customers, and (c) that third party provided your personal data to us. In these situations, we serve as a business associate to that partner or customer, and fully comply with the data privacy and security standards codified in the HIPAA, HITECH, and other related applicable law. Such information is solely used to provide services to the relevant covered entities sharing such information.

How do we use and share your personal information?

We collect and share your personal information through:

- Targeting cookies/Marketing cookies
- Beacons/Pixels/Tags
- Click redirects
- Social media plugins. We use social media features and widgets, such as the ‘Share This’ button on our Website. Such features may process your Internet Protocol (IP) address and track which page you are visiting on our Website. We may place a cookie to enable the feature to work correctly. If you are logged in on a certain social media platform and you interact with a widget or button belonging to that social media platform, this information may be recorded to your profile of such social media platform. To avoid this, you should log out from that social media platform before accessing or using the Website. Social media features and widgets may be hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy notices of the companies that provide them. By clicking on one of these buttons, you agree to the use of this plugin and consequently the transfer of personal information to the corresponding social media service. We have no control over the essence and extent of these transmitted data as well as their additional processing.

More information about our data collection and sharing practices can be found in this privacy notice.

For further details, you may contact us by email at privacy@kalibrate.com.

If you are using an authorized agent to exercise your right to opt-out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be “selling” of your personal data.

We may disclose the following categories of personal information to third parties for a business or commercial purposes:

- Category A. Identifiers, such as contact details, like your real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name.
- Category B. Personal Information, as defined in the California Customer Records law, such as your name, contact information, education, employment.
- Category F. Internet or other electronic network activity information, such as browsing history, search history, online behavior, interest data, and interactions with our and other website, applications, systems and advertisements.
- Category G. Geolocation data, such as device location.

Your rights with respect to your personal data

Right to request deletion of the data – Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

Right to be informed – Request to know

Depending on the circumstances, you may have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell your personal information to third parties;
- the categories of personal information that we sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling personal information

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes

of verification. If, however, we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying your identity.

Other privacy rights

- You may object to the processing of your personal data.
- You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data.
- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent to act on your behalf in accordance with the CCPA.
- You may request to opt-out from future selling of your information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, please contact us at privacy@kalibrate.com

If you have a complaint about how we handle your data, we would like to hear from you. You may contact us at privacy@kalibrate.com

12. Glossary

DATA BROKER

Under California law a Data Broker is a business that “knowingly collects and sells to third parties the personal information of a consumer with whom the business does not have a direct relationship.

Under Vermont law a Data Broker is a business, or unit or units of a business, separately or together, that knowingly collects and sells or licenses to third parties the brokered personal information of a consumer with whom the business does not have a direct relationship.

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and 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 by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

INTERNAL THIRD PARTIES

Other companies in the Kalibrate Group acting as joint controllers or processors and who are based outside the UK and/or EU and provide IT and system administration services and undertake leadership reporting.

EXTERNAL THIRD PARTIES

Service providers acting as processors based inside and outside UK/EU who provide IT and system administration services.

Service providers acting as processors based inside and outside UK/EU who provide marketing services.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

DataRep (EU Representative) addresses:

Country	Address
Austria	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
Belgium	DataRep, Place de L'Université 16, Louvain-La-Neuve, Waals Brabant, 1348, Belgium
Bulgaria	DataRep, 132 Mimi Balkanska Str., Sofia, 1540, Bulgaria
Croatia	DataRep, Ground & 9th Floor, Hoto Tower, Savska cesta 32, Zagreb, 10000, Croatia
Cyprus	DataRep, Victory House, 205 Archbishop Makarios Avenue, Limassol, 3030, Cyprus
Czech Republic	DataRep, IQ Ostrava Ground floor, 28. října 3346/91, Ostrava-mesto, Moravska, Ostrava, Czech Republic
Denmark	DataRep, Lautruphøj 1-3, Ballerup, 2750, Denmark
Estonia	DataRep, 2 nd Floor, Tornimäe 5, Tallinn, 10145, Estonia
Finland	DataRep, Luna House, 5.krs, Mannerheimintie 12 B, Helsinki, 00100, Finland
France	DataRep, 72 rue de Lessard, Rouen, 76100, France
Germany	DataRep, 3rd and 4th floor, Altmarkt 10 B/D, Dresden, 01067, Germany
Greece	DataRep, 24 Lagoumitzi str, Athens, 17671, Greece
Hungary	DataRep, President Centre, Kálmán Imre utca 1, Budapest, 1054, Hungary
Iceland	DataRep, Kalkofnsvegur 2, 101 Reykjavík, Iceland
Ireland	DataRep, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland
Italy	DataRep, Viale Giorgio Ribotta 11, Piano 1, Rome, Lazio, 00144, Italy
Latvia	DataRep, 4th & 5th floors, 14 Terbatas Street, Riga, LV-1011, Latvia
Liechtenstein	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
Lithuania	DataRep, 44A Gedimino Avenue, 01110 Vilnius, Lithuania
Luxembourg	DataRep, BPM 335368, Banzelt 4 A, 6921, Roodt-sur-Syre, Luxembourg