

## PLAYFAIR DATA PRIVACY POLICY

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Playfair Data, LLC, on behalf of itself and its subsidiaries and affiliates (collectively referred to as “**Playfair**”, “**us**”, “**our**”, or “**we**”) delivers consulting, training, content and other services (“**Content**”) at both live events and from our websites, playfairdata.com and playfairdata.tv, and all Playfair-operated websites or applications that link to this Privacy Policy (collectively, the “**Platform**”). This Privacy Policy explains how Playfair Data LLC and its affiliates (collectively, “**Playfair**”, “**we**”, “**us**”, or “**our**”) collect, protect, use, and disclose your Personal Information through our Content, Platform, third parties, services and products controlled by Playfair, and any other online or offline interaction with Playfair (collectively, “**Services**”).

As used in this Privacy Policy, “Personal Information” means any information relating to an identified or identifiable person. Examples of Personal Information include, among others, name, email address, phone number, and online identifiers. When we combine Personal Information with other information, we treat the combined information as Personal Information. On the other hand, if we alter or aggregate Personal Information such that it can no longer be reasonably used to identify you, such information is no longer Personal Information.

We may revise and update this Privacy Policy from time to time and will post the updated Privacy Policy to the Platform. If these changes are material (i.e., changes we believe you will find important), we will post notice of the changes on the Platform. We do not ordinarily provide advance notice of a minor change. You can tell when changes have been made to the Privacy Policy by referring to the “Last Updated” legend on top of this page. Where required by applicable law, we will obtain your consent. **UNLESS OTHERWISE INDICATED, ANY CHANGES TO THIS PRIVACY POLICY WILL APPLY IMMEDIATELY UPON POSTING TO THE PLATFORM.**

Playfair may provide you with a different privacy policy in certain specific situations, in which case that privacy policy or notice will apply to the Personal Information collected or processed in that specific situation, rather than this one.

This Privacy Policy is available to persons with disabilities. To access this Privacy Policy in an alternative, downloadable format, please click [here](#).

### 1. Personal Information We Collect Through the Platform

Playfair is a technology and data company that, through the Platform or offline interactions, provides you with educational videos and training materials on how to use and harness certain technology as applied to data. The types of Personal Information that we may collect for the purposes described in this Privacy Policy are described in this section and include Personal Information that you voluntarily provide to us, Personal Information that we collect automatically when you use Services, and Personal Information that we collect from other sources. This section describes the types of Personal Information we collect through our Services and how we use it.

#### A. Personal Information You Provide

We collect Personal Information that you provide to us through the Platform and use such Personal

Information for purposes relating to the reasons you provided it to us and to help us improve our Services. For example, we collect information such as:

- identifiers and contact information such as your name, email, phone number, or other information you submit when communicating with us, such as the “contact us” sections of our Services.
- commercial and purchase information, such as items you purchase, shipping address, billing address and contact information for order details, statuses, or issues.
- account and profile information, such as your username and password to access password protected portions of our Platform
- personal information in communications you send to us

#### **B. Personal Information We Receive from Third Parties**

Identifiers and commercial information, such as your name, billing address, credit card type, last four digits of credit card, and expiration date of credit card.

#### **C. Information We Collect Automatically**

Whenever you interact with the Platform, we automatically receive and record information Internet or other electronic network activity information from your browser or device. Personal Information collected automatically may include your IP address, device ID, the type of browser you are using to access the Platform, and the identity of the Platform page or feature you are requesting. We may use such information to analyze trends, administer the Platform, and gather broad demographic data for aggregate use.

We may use “cookies” or other tracking technologies (e.g., web beacons, single-pixel, or clear GIFs) to track how you use the Platform for analytics and security purposes. A cookie is a file stored on your computer or device to uniquely identify your device or to store information or settings on your device. To understand and exercise your choices regarding the cookies we use, please click on the “Cookie Settings” button at the bottom of any page. **You may adjust your web browser software if you do not wish to receive cookies or web beacons, but this may prevent you from taking advantage of some of the Platform’s features.** Please refer to your browser instructions or help pages to learn more about these functions. To assist us with analyzing our website traffic through cookies and similar technologies, we use analytics services such as Google Analytics. For more information on Google Analytics’ processing of your information, please see [“How Google uses data when you use our partners’ Platforms or apps.”](#)

Some of our service providers may use cookies or other methods to gather information regarding your use of the Platform and may combine the information in these cookies with any of your Personal Information that they may have. The use of such information by a third party will be governed by the privacy policy or notice of that third party, not this Privacy Policy.

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, our Platform does not currently interpret, respond to or alter their practices when it receives “Do Not Track” signals.

## **2. When Personal Information is Collected**

You may be required to provide us with certain information that may constitute Personal Information in the following ways:

### **A. Contact Information**

In various areas of our Platform and in printed materials, we provide you the opportunity to submit a form with contact information, such as your name, email, or mailing address. Playfair may use such information to inform you of new products, technical information and services, and upcoming events that may be of interest. If you no longer wish to receive any promotional emails, the opt-out process is described in Section 7 of this Privacy Policy.

### **B. Member Login Information**

We process your username and password to enable you to securely log into our Platform, and we process information regarding your role with Playfair to appropriately control access to restricted content. We process this Personal Information only as necessary to provide you services on our Platform under our Terms of Use and to further our legitimate interests in protecting our Platform and content.

### **C. Payment Information**

When you purchase services or products from us, third-party service providers acting on our behalf process payment information, including payment card details and billing and shipping addresses, to help us fulfill your orders. We, with support from our authorized service providers (see the Service Providers in Section 4 of this Privacy Policy below), will only use your payment information to process your payments to provide you with the products or items you ordered through our Services.

### **D. Information Collected Through Various Forms**

We and our service providers may collect Personal Information in a variety of ways, including: (i) through use of our Platform, e.g., when you sign up for a newsletter or make a purchase; (ii) offline, such as when you attend one of our conventions or events; or (iii) 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.

### **E. Personal Information You Disclose Relating to Others**

If you disclose any Personal Information relating to other people to us or to our service providers in connection with our Services, you are responsible for complying with all privacy and data protection laws prior to providing that information to us (including obtaining consent, if required).

## **3. The Purposes for Which We Use Personal Information**

In addition to the purposes outlined in Section 2 of this Privacy Policy, If you submit or we collect Personal Information through our Platform, then such Personal Information may be used in the following ways:

- to provide you with our Services
- to communicate with you
- to administer our relationship with your organization
- to identify and authenticate you
- to detect security incidents
- to protect against malicious, fraudulent, or illegal activity
- to ensure the appropriate use of our Services

- to improve our Services
- for short-term, transient use
- for administrative purposes
- for marketing, internal research, and development
- for quality assurance
- to comply with legal and regulatory obligations

#### **4. The Lawful or Legal Bases of Processing?**

Some jurisdictions require us to state the legal bases (i.e., legally recognized reasons) for processing your Personal Information, but please note that not all jurisdictions recognize all legal bases. The legal bases we rely upon include those enumerated in Articles 6 and 9 of the European Union's General Data Protection Regulation (GDPR), and include:

- to prepare for or to perform a contract with you
- to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights
- for the purposes of our legitimate interests
- in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law

When required and allowed, we will seek to obtain your consent or authorization to process your Personal Information and only process your Personal Information upon receiving such consent. In such circumstances, your refusal to provide consent or authorization will have no adverse consequence on you. However, in some circumstances where consent is required, it may be impossible for Playfair to manage its relationship with you or provide you with the Services absent your consent to process your Personal Information.

#### **5. How We Disclose Personal Information**

We will not disclose your Personal Information except as set forth in this Privacy Policy. We may disclose your Personal Information to the following categories of people and entities:

- Playfair and our affiliates
- your company / employer
- individuals or entities that you designate or instruct us to share your Personal Information with
- authorized representatives
- third parties who assist with fraud prevention, detection, and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- Playfair's lawyers, auditors, and consultants
- partners that assist us in providing or improving our Services or help us improve our marketing or administration

In limited circumstances, recipients may include, (1) in the event of a sale, assignment, merger, consolidation, corporate reorganization, or transfer, to the buyer, assignee, or transferee; and (2) government or regulatory officials, law enforcement, courts, public authorities, or others when permitted by this Privacy Policy or required by law.

We do not “sell” your Personal Information or share it for the purposes of cross-context behavioral (i.e., “targeted”) advertising or profiling nor do we process your sensitive Personal Information to infer characteristics about you. We do allow certain third parties to collect information about the users of our Services to provide valuable services to us, such as fraud detection, reporting, and analytics. This may include sharing information about your interactions with our Services, including information searched for or viewed in connection with our Online Services for the purposes of providing you with information related to your searches, queries, or other interactions with our Services.

We do not engage in profiling subject to the privacy laws using Personal Information.

## **6. Protection of Your Personal Information & Data Retention**

While we use commercially reasonable security measures to prevent unauthorized persons from accessing our files or tampering with our Services, we cannot guarantee that these efforts will always be successful. Your Personal Information may be accessed and viewed by other Internet users, without your knowledge and permission, while in transit to or from us.

We generally retain Personal Information for as long as needed for the specific purpose or purposes for which it was collected or obtained, and as outlined in this Privacy Policy. In some cases, we may be required to retain Personal Information for a longer period of time as required by law or for other necessary or required purposes. Whenever possible, we aim to de-identify or anonymize your Personal Information or otherwise remove some or all information that may identify you from records that we may need to keep for periods beyond the specified retention period. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject that affects the length of time we need to keep your Personal Information; and (iii) whether retention is determined to be necessary for Playfair due to limitation periods, litigation, or other legal or regulatory obligations. Playfair takes reasonable steps to securely dispose of Personal Information upon the expiration of retention periods, taking into consideration these litigation, legal, or regulatory obligations.

## **7. Your Rights Regarding Your Personal Information**

Depending on where you live, you may have the following rights with respect to some or all of your Personal Information:

- to request information about or explain whether, and how, we process your Personal Information
- to request access to and a copy of your Personal Information, including to provide your Personal Information directly to another organization (called, in some locations, a right to data portability)
- to request that we correct or update your Personal Information
- to request that we delete your Personal Information
- to opt out of us selling or disclosing your Personal Information for targeted advertising
- to request that we restrict, suspend, block, or to object to or opt-out of the processing of your Personal Information, including your sensitive Personal Information, including withdrawing consent
- to appeal the denial of a request
- to lodge a complaint with the data protection authority in your jurisdiction

To make a request, submit a complaint about how we process your Personal Information, or to appeal the denial of one of your requests, please [contact us](#) using the information at the bottom of this Privacy Policy. Even if you make a complaint to us, you may also in some jurisdictions lodge a complaint with the relevant privacy or data protection authority in your location.

We will not discriminate against you for exercising any of the rights described above, although we may not be able to continue to provide you with certain Services or it may otherwise affect the way we are able to interact with you.

We will make reasonable efforts to respond promptly to your requests. We may, after receiving your request, require additional information from you to honor your request and verify your identity. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

#### **8. Opting Out of Receiving Electronic Communications**

We will obtain your consent before sending notifications, newsletters, promotions, or other information via email or other electronic methods (“Communications”) to you. Such Communications may include information regarding our Services, marketing or promotional materials, or other information. You may choose to stop receiving Communications by clicking on the conspicuous “Unsubscribe” link or by following the unsubscribe instructions in any Communication you receive. Please note that certain service-related Communications are necessary for the proper functioning and use of our Services, and you may not have the ability to opt out of those Communications.

#### **9. Third-Party Websites**

The Platform may include or provide links to other websites that we do not control. Even if an affiliation exists between Playfair and third-party websites, each of these linked Platforms maintains its own independent privacy and data collection policies and procedures, which we encourage you to consult.

#### **10. Users from Outside the United States**

Our Services are intended for residents of the United States. If you are using our Services from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. If you object to such processing, you should cease using the Services.

#### **11. Personal Information of Children**

Playfair does not knowingly collect, maintain, disclose, or otherwise process Personal Information from minors below the age of 16 without the permission of such minor’s parents or legal guardians. If you are the parent or legal guardian of a child under the age of 13 whom you have reason to believe has provided his or her own Personal Information to us, you have the right to request the removal of that child’s Personal Information from our database. In order to request such removal, please send an email to [contact@playfairdata.com](mailto:contact@playfairdata.com). You will be required to verify your identity as the child’s parent or legal guardian in order to have their Personal Information removed.

#### **12. Contact Us**

If you have any questions concerning this Privacy Policy, please contact us by e-mail at [contact@playfairdata.com](mailto:contact@playfairdata.com) or by completing our [contact form](#).