

EUROPEAN USERS' PRIVACY RIGHTS

Some data protection laws, including the European Union's General Data Protection Regulation ("GDPR"), provide you with certain rights in connection with personal data we have collected or you have shared with us. We attempt to process your personal data in accordance with applicable law. In addition to the information provided above, residents of the European Economic Area should be aware of the following.

- **Legal basis for processing your personal data.** Whenever we collect personal data from you, we may do so on the following legal bases:
 1. We may collect and process your personal data where you have given us *consent* to do so. In addition, we will request your explicit consent before we process any special category personal data about you. You may withdraw your consent at any time by contacting us in accordance with the "How to Contact Us" section below;
 2. We may collect and process your personal data where it is necessary to *perform a contract* with you including supplying/providing products or services; and
 3. We may collect and process your personal data where it is necessary for us to pursue our *legitimate interests* as a business, or those of a third party, for the following purposes:
 - Intra-organization transfers of client data for administrative purposes;
 - Product development and enhancement, where the processing enables the Company to enhance, modify, personalize, or otherwise improve our Services and communications for the benefit of our users, and to better understand how people interact with our Sites;
 - Communications and marketing, including processing data for direct marketing purposes, and subject to your opt-in for these purposes, and to determine the effectiveness of our promotional campaigns and advertising;
 - Fraud detection and prevention;
 - Enhancement of our cybersecurity, including improving the security of our network and information systems; and
 - General business operations and diligence.

Provided that, in each circumstance, we will weigh the necessity of our processing for the purpose against your privacy and confidentiality interests, including taking into account your reasonable expectations, the impact of processing, and any safeguards which are or could be put in place. In all circumstances, we will limit such processing for our legitimate business interest to what is necessary for its purposes.

- **Additional Rights.** If you are resident in the European Economic Area, you may have the following additional rights relating to your personal data, subject to certain limitations:
 1. The right to be informed. You are entitled to be informed of the use of your personal data. This Privacy Statement provides that information to you.

2. The right of access. You have the right to request a copy of your personal data which we hold about you.
3. The right of correction: You have the right to request correction or changes of your personal data if it is found to be inaccurate or out of date.
4. The right to restrict processing. You have the right to restrict processing of your personal data where you believe it is unlawful for us to process it, you require us to keep it in connection with legal proceedings, or pending an investigation where you have objected to the processing of your personal data.
5. The right to be forgotten: You have the right to request us, at any time, to delete your personal data from our servers and to erase your personal data when it is no longer necessary for us to retain such data. Note, however, that deletion of your personal data will likely impact your ability to use our Services.
6. The right to object (opt-out): You have the right to opt-out of certain uses of your personal data, such as direct marketing, at any time.
7. The right to data portability: You have the right to a "portable" copy of your personal data that you have submitted to us. Generally, this means your right to request that we move, copy or transmit your personal data stored on our servers / IT environment to another service provider's servers / IT environment.
8. The right to refuse to be subjected to automated decision making, including profiling: You have the right not to be subject to a decision and insist on human intervention if the decision is based on automated processing and produces a legal effect or a similarly significant effect on you.
9. The right to lodge a complaint with a supervisory authority.

Please note that these rights may not apply to individuals residing outside the EEA. To make a request related to your rights, you may contact us using the contact information below.

The Transfer or Storage of Your Personal Data.

The personal data that we collect from you may be transferred to countries outside the European Economic Area ("EEA"). This may include where any of our servers or those of our third party service providers are located in a country outside of the EEA or it is processed by our staff or the staff of our third party service provider operating outside the EEA. These countries may not have similar data protection laws to the country in which you reside. If we transfer your personal data outside of the EEA we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected in accordance with this Policy. These steps may include imposing appropriate contractual obligations on the recipient of your personal data. If you are located in the EEA, you understand and consent to having your personal data processed outside of the EEA, including in the United States.

HOW TO CONTACT US

If you have any specific questions, please see our [Privacy Statement](#) for additional information, including how to contact us.

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