

Transform CX (“we,” “us,” or “our”) offers digital business transformation services. This Privacy Policy sets out how we collect, use, share, and protect any information we collect through this website as well as in the context of external marketing events. This Privacy Policy also explains the measures we take to safeguard your information and describes how you may contact us regarding our privacy practices.

Please note, this Privacy Policy does not apply to the services provided by us on behalf of clients or to data that we process on behalf of our clients.

Introduction

Any data collected through the Website or external marketing events held by Transform CX or its partners, including personal data as defined under applicable data protection laws (collectively, “Personal Data”), will only be used for the purposes set out in this Privacy Policy. Notwithstanding, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law.

Transform CX Limited, 167-169 Great Portland Street, 5th Floor, W1W 5PF London (United Kingdom), Transform CX Pvt. Ltd, Block K, Building No. 10 Malviya Nagar, New Delhi – 110017, taken together, are considered the independent Controller of the data collected through this Website.

Please read this Privacy Policy thoroughly. If you disagree with the way Personal Data will be used, please do not use this Website or provide your Personal Data through the website. For our Canadian users, your use of the Website constitutes your implied consent for us to process your Personal Data for the below-noted purposes.

We may include links to other websites, including social media platforms. This Privacy Policy only covers this Website or external marketing events held by Transform CX or its partners

and does not apply to the data practices of other websites. We encourage you to read the privacy notices available on websites you visit.

This Privacy Policy does not cover employee data or data collected during the application process.

I. What Personal Data do we collect and process through the Website and how do we process and disclose the Personal Data?

The following table describes the categories of Personal Data we collect.

Categories of Personal Data we collect	
Category of Personal Data	Types of Personal Data Processed
Contact Information and Identifiers	First name, last name, e-mail address, telephone number, job title, employer's name, country, online identifiers; IP address; mobile ad identifiers, third party cookies.
Internet or other electronic network activity information (Technical Data)	Operating system, browser type, browsing history; search history; online interests, such as information about categories of consumer interests derived from online usage; and information on a consumer's interaction with a website, application, or advertisement such as referring domains and exit links and their journey on our Website.
General Geolocation Data	Non-precise location information from your device or IP address.
Information you communicate to us or share on the public areas of our site	Information that you directly send us by using the comment functionality on this Website.

II. Who do we collect Personal Data from?

We may collect the Personal Data outlined above from the following categories of sources:

- **Information you provide directly.** For example, when you use the contact form to inquire about our services, download a white paper, submit your information to us at an external marketing event or tradeshow, or to register for a Transform CX-sponsored event.
- **Information obtained from third parties.** Information about you that may come from data brokers, partners (e.g., those that offer co-branded services, sell or distribute our products, or engage in joint marketing activities), data analytics providers, and social networks.
- **Information collected when you engage with the Website.** Information collected from you using automated technologies, such as cookies, pixels, third party tags, scripts, log files and other means to automatically collect information about the use of our Website.
- **Information from our Clients.** If Personal Data about you has been processed by us on behalf of a client (or any controller as per GDPR) and you wish to exercise any rights you have, we may have to ask you to inquire with our client directly. We will support the client (or controller) to the extent required by applicable law in responding to your request.
- **Information we do not seek.** We do not intend to collect “special” or “sensitive” information from or about you (e.g., government identifiers, information on race or ethnicity, political opinions, religious beliefs, health data). We ask that you do not provide such information, and if we find such information we will delete it.

III. Purpose of Data Collection and Legal Basis

Employees of Transform CX (from Sales, Marketing, IT, Operations, and Finance) are processing your data. Any processing of your Personal Data by these employees is in accordance with our instructions. The following table provides information about our purposes and legal basis for collecting and using your personal data:

Purpose and Legal Basis for collecting and using your personal data

Purpose of Collection of Personal Data	Basis for Collection
To read and respond to your inquiries sent using our online query or data access request forms.	Depending on your request, we will rely on our legitimate interest or the performance of pre-contractual measures to respond to individuals' queries.
To contact you where you have indicated you wish to be contacted.	For visitors from the EU/UK, we rely on your consent, where you indicate that you want to receive marketing material from us; for visitors from other geographies, we rely on our legitimate interest for direct marketing purposes.
Operating, analysing, improving, and securing our Website.	We rely on your consent to collection and use of your personal data through cookies for visitors from the EU/UK; for visitors from other geographies, we rely on our legitimate interest to improve our services and develop new products.
Marketing services that may include • Assisting in targeting and optimizing of direct mail and email campaigns, display, mobile and social media marketing. • Measuring the effectiveness of online or offline ad campaigns by determining which messages are most likely to be seen or opened by which types of consumers and potential clients, or which types of ads are most likely to lead to purchases. • Analyzing and optimizing our (or our service providers') proprietary databases or helping us identify and mitigate potential fraud. • Providing "verification" or data "hygiene" services, which is how companies update and/or "clean" their databases by either verifying or removing or correcting old, incorrect or outdated information.	For visitors from the EU/UK, we rely on your consent to use your Personal Data for marketing services; for visitors from other geographies, we rely on our legitimate interest to improve our services and develop new products.
Other internal purposes, such as website maintenance, quality control, and legal	We rely on our legitimate interest to support our internal operations and

Purpose and Legal Basis for collecting and using your personal data

Purpose of Collection of Personal Data	Basis for Collection
compliance.	conduct research.
Legal purposes, such as: (a) comply with legal process or a regulatory investigation (e.g. regulatory authorities' investigation, subpoena, or court order); (b) enforce our Terms of Service, this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of other parties; and/or (d) protect the rights, property or personal safety of us, our platform, our customers, our agents and affiliates, its users and/or the public. Such disclosure may be for a business purpose but may also be considered a "sale" under certain state privacy laws.	We rely on our legal obligation or the performance of contract to support such legal purposes.
In the event of a corporate transaction including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets, or for purposes of due diligence connected with any such transaction.	We rely on our legitimate interest or performance of contract to support our corporate transactions.
We may aggregate, de-identify and/or anonymize any information collected so that such information can no longer be linked to you or your device (" <i>Aggregate/De-Identified Information</i> "). We may use Aggregate/De-Identified Information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any other party, including advertisers, promotional partners, and sponsors, in our discretion, unless otherwise prohibited by applicable law.	We rely on our legitimate interest to support our internal operations.
We use analytics services, such as Google Analytics, to help us understand how users access and use the Website.	We rely on your consent as required by law or our legitimate interest to support our internal operations.
When you contact us through the data access request form.	We rely on our legal obligation to provide you a process to exercise your rights.

Interest-based advertising. We work with agencies, advertisers, ad networks, and other technology services to place ads about our products and services on other websites and services. For example, we place ads through Google and Facebook that you may view on their platforms as well as on other websites.

Targeted or Cross-Context Behavioral Advertising. As part of this process, we may incorporate tracking technologies into our own Website as well as into our ads displayed on other websites and services. Some of these tracking technologies may track your activities across time and services for purposes of associating the different devices you use and delivering relevant ads and/or other content to you ("**Interest-based Advertising**").

Interest-based Advertising is also called Targeted Advertising or Cross-Context Behavioral Advertising. We also use audience matching services to reach people (or groups of people) who have visited our Website or are identified in one or more of our databases ("**Matched Ads**"). This is done by uploading a customer list to another party or incorporating a pixel from another party into our own Website, and the other party matching common factors between our data and their data or other datasets. For instance, we incorporate the Facebook pixel on our Website and may share your email address with Facebook as part of our use of Facebook Custom Audiences.

As indicated below, vendors and other parties may in certain contexts, independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

IV. With Whom do we Share or Sell Personal Data?

We may disclose your Personal Data collected and processed through this Website for various purposes related to our business. The disclosure may be to our clients, partners, or vendors.

Sharing Personal Data under the California Privacy Rights Act means to disclose your Personal Data to a third party for Interest-based Advertising.

Selling Personal Data means to disclose your Personal Data to a third party for an exchanged value and a purpose other than one of the listed business purposes below in section V of this Privacy Policy.

The table below shows with whom we may Share or Sell your Personal Data, and whether we believe we have “sold” or “shared” a particular category of information in the prior 12 months.

Disclosure of sharing or selling your Personal Data			
Category	Parties With Whom We Share Your Data	“Sold” in the Last 12 Months	“Shared” in the Last 12 Months
Contact Information and Identifiers	Affiliates, service providers, advertising partners, analytics partners, promotional partners.	Yes	Yes
Internet or other electronic network activity information	Affiliates, service providers, advertising partners, analytics partners, promotional partners.	Yes	Yes
General Geolocation data	Affiliates, service providers, advertising partners, analytics partners, promotional partners.	Yes	Yes
Your verbatim communications to us or shared on the public areas of our site	N/A	No	No

V. With Whom do we disclose your Personal Data?

We may disclose your Personal Data or Sensitive Personal Data to our service providers that assist us with our business purposes. Our service providers are to only process your Personal Data in accordance with our instructions and only for the purpose(s) listed below.

The table below shows with whom we disclose your Personal Data for the specific business purpose(s).

Categories of parties with whom we disclose your data for a business purpose		
Category of Personal Data	Categories of Parties with Whom We Disclosed Your Data for a Business Purpose	Business Purpose for the Disclosure
Contact Information and Identifiers	Affiliates, service providers, advertising partners, analytics partners, promotional partners.	Providing advertising and marketing services to the consumer, provided that for the purpose of advertising and marketing, the Processor shall not combine the personal information of opted-out consumers
Internet or other electronic network activity information	Affiliates, service providers, advertising partners, analytics partners, promotional partners.	Providing advertising and marketing services, provided that for the purpose of advertising and marketing, the Processor shall not combine the personal information of opted-out consumers
General Geolocation data	Affiliates, service providers, advertising partners, analytics partners, promotional partners.	Providing advertising and marketing services to the consumer, provided that for the purpose of advertising and marketing, the Processor shall not combine the personal information of opted-out consumers
Your verbatim communications to us or shared on the public areas of our site	N/A	N/A
Inferences	Affiliates, service providers	For analytics purposes and for providing advertising and marketing services to the

Categories of parties with whom we disclose your data for a business purpose

Category of Personal Data	Categories of Parties with Whom We Disclosed Your Data for a Business Purpose	Business Purpose for the Disclosure
		consumer, provided that for the purpose of advertising and marketing, the Processor shall not combine the personal information of opted-out consumers

VI. Automated Decision Making and Profiling

To the extent that we use processes that involve automated decision making or profiling when processing your Personal Data, we take steps to ensure that any automated decision making or profiling practices are fair and not discriminatory. Situations where we may use profiling in connection with your Personal Data include personalizing the Website and advertising campaigns to market service(s) that may be of the most importance to you.

VII. How Long We Keep Your Information

We keep Personal Data for as long as is necessary for the purposes described in this Privacy Policy, complying with legal and regulatory obligations, protecting our or other's interests, and as otherwise permitted or required by law. When Personal Data is no longer necessary for or compatible with these purposes, it is removed from our systems in accordance with our internal retention policies. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Website or our services to you;
- Whether our processing of the Personal Data is consistent with what an average consumer would expect when the Personal Data was collected;

- Whether the Personal Data is processed for any other disclosed purpose(s) compatible with what is reasonably expected by the average consumer;
- Whether the Personal Data is relevant and useful to the provision of our services and our further processing is permitted by law;
- Whether the Personal Data has been de-identified, anonymized, and/or aggregated; and
- Whether there is a legal obligation to which we are subject.

VIII. Your Rights and choices regarding Personal Data

Please send us an email at contact@transformcx.co.uk with the word unsubscribe in the subject field of the email if you want to make use of any of your below mentioned legal rights.

1. Where You Are a Resident of the EU/UK

Subject to certain exceptions and the jurisdiction in which you live, if you are a resident of the EU, the GDPR provides you with specific rights regarding your Personal Data. This subsection describes your rights and explains how to exercise those rights regarding Personal Data that we hold about you. These rights include:

1.1. Right of access:

You can **access all Personal Data we hold about you, know the origin of this Personal Data and obtain a copy in an understandable format.**

You may also use your right to access your Personal Data to control the exactness of the data and have them rectified or deleted. You have no justification to provide to exercise your right to access;

1.2. Right to rectification:

In order to avoid that inaccurate or incomplete Personal Data relating to you is processed or shared, you can ask us to rectify them;

1.3. Right to erasure:

You may request the erasure or deletion of the Personal Data we hold on you. This is not an absolute right since we may have to keep your Personal Data for legal or legitimate reasons.

You may, for example, exercise your right to deletion in the following cases:

- (a) if you have withdrawn your consent to the processing (see below);
- (b) if you legitimately objected to the processing of your data (see below);
- (c) when data is not or is no longer necessary for the purposes for which it was initially collected or processed;
- (d) the data is processed unlawfully (e.g., publishing hacked data);

1.4. Right to object to the processing of your Personal Data:

We process your Personal Data based on our legitimate interest (to determine to which processing this applies, please refer to Section III of this Privacy Policy), you may at any time object to the processing of your Personal Data for reasons relating to your personal situation. We may nevertheless, on a case-by-case basis, reject such a request by pointing out the legitimate and imperious reasons justifying the processing of this data which prevail on your interests, rights and freedoms, or when this data is necessary to establish, exercise or defend a right before a Court.

1.5. Right to restrict processing:

The right to limit the processing **completes your other rights**. This right means that **the data processing relating to you and that we are performing is limited, so that we may**

keep this data, but we cannot use it or process it in any other manner. This right applies in specific circumstances, i.e.:

- (a) if you challenge the exactness of your Personal Data. The processing is then limited for a period of time so that the agency may verify the exactness of the Personal Data;
- (b) if the processing is unlawful and you object to the erasure of your Personal Data and request instead that its use be limited;
- (c) if we do not need the Personal Data for the purposes mentioned above in Section III anymore, but you still need it to establish, exercise or defend rights before a Court; and
- (d) in the cases where you objected to the processing which is based on the legitimate interests of the agency, you may ask to limit the processing for the time necessary for us to verify if we can accept your objection request (i.e., the time necessary to verify whether the legitimate reasons of the agency prevail over yours).

1.6. Right to object to data processing for direct marketing purpose

You may unsubscribe or object, at any time and without any justification, to the reception of direct marketing communications. Simply either (i) click on the link in the footer of the communications you receive from us; or (ii) send us an email at contact@transformcx.co.uk with the word unsubscribe in the subject field of the email.

1.7. Right to data portability:

- (a) You may request to **retrieve the Personal Data you provided us with**, in a structured, commonly used, and machine-readable format, for personal use or to share them with a third party of your choice.
- (b) This right **only** applies to Personal Data you provided us with, directly or indirectly, and which was processed through automated means, if this processing is based on your consent

or the performance of a contract. Please check the list of our Personal Data processing activities' legal grounds (in Section III of this Privacy Policy) to know whether our processing is based on the performance of a contract or on consent.

1.8. Right to withdraw your consent to the processing of your Personal Data at any time:

(a) You may read Section III of this Privacy Policy in order to identify the purposes for which the processing of your Personal Data is based on your consent.

(b) If you are unsatisfied with the way we process your Personal Data or if your request has been rejected, you may also lodge a formal complaint with your local competent data protection authority.

(c) Personal Data will be stored in accordance with our applicable data retention requirements and corporate policies. The retention period for Personal Data varies depending on the type of Personal Data and the purposes of processing it.

(d) We will respond without undue delay and in any event within one month from the date we receive your request. This timeframe can be extended by two months to take the complexity of the request, or the number of requests received into account. In this case, we will inform you within one month from receiving your request, specifying the reasons for extending the response timeframe.

2. Where You are a non-EU Resident

You may have privacy rights based on the laws of your jurisdiction of residence, such as the states of California or Virginia or the provinces and country of Canada. This section describes how to exercise those rights and our process for handling those requests. (To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.)

2.1. Right to request access to Your Personal Data

If the state/province/country in which you reside provides you with the right of access or know the Personal Data which Transform CX processes about you, you may request, up to two times per year, access to the categories and specific pieces of Personal Data about you that we collect.

When exercising the right to access Personal Data, you have the right to obtain materials in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.

When we receive and verify your request to access your Personal Data, we will make best efforts to fulfill your request unless an exception applies. We will not disclose your government identification numbers, financial account numbers, health insurance or medical identification numbers, account passwords, security questions and answer, or unique biometric data; however, to the extent we have this information, we will inform you that we have collected this information. You are permitted 2 access reports every 12 months.

2.2. Right to request deletion of Your Personal Data

You may also request that we delete any Personal Data that we obtained about you. However, we may retain Personal Data for certain important purposes, as set out by applicable law.

When we receive and verify your request to delete your Personal Data, we will proceed to delete the data unless an exception applies. We will retain a record of your deletion request in order to keep your Personal Data deleted, unless and until you provide consent for the processing of your Personal Data post your deletion request.

2.3. Right to correct your Personal Data

If you believe we hold inaccurate personal information about you, you may request that we correct that information. We may ask for documentation showing that the information you

submit is accurate and the Personal Data we hold is inaccurate. Once we receive your request, we will verify your identity and taking into account the type of personal information and the purposes of our holding that personal information we will make best efforts to complete your request. We may deny your request if we determine that the contested Personal Data is more likely than not accurate. Additionally, we may choose to delete your Personal Data in response to your request to correct your Personal Data if the deletion of your Personal Data would not negatively impact you.

2.4. Right to limit use of Sensitive Personal Data

You may request that we limit the use and disclosure of your Sensitive Personal Data. However, we may deny your request in part or in full under uses authorized by applicable law or if we do not collect your Sensitive Personal Data.

2.5. Right to non-discrimination

We will not deny, charge different prices for, or provide a different level of quality of goods or services if you choose to exercise your privacy rights.

2.6. Right to opt-out of the sale of your Personal Data

Depending on what information we have about you, and whether we have disclosed any of it to a third party in exchange for valuable consideration, we may have sold (as defined by US state laws) certain Personal Data about you, as described in the above table in Section IV of this Privacy Policy. If you would like to opt out, you may do so by sending us an email at contact@transformcx.co.uk with the subject "Do Not Sell My Personal Information".

2.7. Right to opt-out of share/cross contextual behavioral advertising and targeted advertising

You may opt-out of the processing or sharing of your Personal Data for cross-contextual behavioral advertising or targeted advertising (what we refer to above as Interest-based

advertising) by sending us an email at contact@transformcx.co.uk with the subject “Opt-out of advertising”.

Additionally, you may choose not to receive targeted advertising from ad networks, data exchanges, and other digital advertising providers by opting out of targeted advertising via YourAdChoices powered by the Digital Advertising Alliance.

2.8. Right to opt-out of automated decision making and profiling

It's your right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect. You may opt-out of the processing of your Personal Data for profiling and other automated decision making by sending us an email at contact@transformcx.co.uk with the subject “Opt-out of profiling”.

2.9. Universal Opt-Out Mechanisms

Our Website recognizes certain global opt-out of sale and share preference signals like the Global Privacy Control and the IAB CCPA privacy string. This means that if you enact your choice to opt-out or opt-in through these signals, we will honor your choice upon receiving the signal related to your visit on our Website. We will apply your preference to the Personal Data we collected from our Website. If you have previously provided affirmative consent for the sale or share of your Personal Data, and your opt-out choice via the signal conflicts with such consent, we will ignore the opt-out choice via the signal.

2.10. Shine the Light

Customers who are residents of California may request (i) a list of the categories of Personal Data disclosed by us to third parties during the immediately preceding calendar year for those third parties' own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at the

email or postal address set out in the “Further Information” section below and specify that you are making a “California Shine the Light Request.”

2.11. How to Exercise Your Privacy Rights in the U.S.

US residents may exercise their applicable privacy rights by sending an email to privacyoffice@transformcx.co.uk.

For security purposes (and as required under US state laws), we will verify your identity—in part by requesting certain information from you—when you make a request to access, correct, or delete, your Personal Data. The verification process will utilize an email verification process, a telephone number verification process, and, if applicable, a request for any assigned ID number previously communicated to you.

If we are unable to complete your request fully for any reason, we will provide you additional information about the reasons why we could not comply with your request.

You may also designate an agent to make requests to exercise your rights under certain US state laws. We will take steps both to verify your identity and to verify that your agent has been authorized to make a request on your behalf by requesting your agent to provide us with a signed written authorization or a copy of a power of attorney executed by you.

2.12. Appeal

It is your right to appeal a decision made concerning the exercise of your data privacy rights. You may appeal this decision within 60 days of receiving your response from us. To submit your appeal, contact privacyoffice@transformcx.co.uk.

2.13. Where you are a Resident of Nevada

Nevada law (NRS 603A.340) requires each business to establish a designated request address where Nevada consumers may submit requests directing the business not to sell

certain kinds of Personal Data that the business has collected or will collect about the consumer. A sale under Nevada law is the exchange of Personal Data for monetary consideration by the business to a third party for the third party to license or sell the Personal Data to other third parties. If you are a Nevada consumer and wish to submit a request relating to our compliance with Nevada law, please contact us as at privacyoffice@transformcx.co.uk.

3. Where you are a resident of Canada

3.1. Right to request access to your Personal Data

You have a right to access your Personal Data in our control. We will also provide you with a description of what uses we have made of your Personal Data and which third parties we have shared it with. In some cases, we may not be able to provide you with access to your Personal Data, such as where:

- Personal data about another person might be revealed and the other person's personal information cannot be separated from yours;
- Commercially confidential information might be revealed and the confidential information cannot be separated from yours;
- The requested data is subject to solicitor and client privilege;
- Someone's life or security might be threatened as a result of giving you access and the personal data about the other person cannot be separated from yours;
- The information was collected for purposes related to an investigation of a breach of an agreement or contravention of the law.

We will respond to your request within 30 days, unless we require more time to do so, in which case we will advise you of the date by which we will respond to your request within 30 days of receiving it.

3.2. Right to request correction to your Personal Data

If you note any inaccuracies or wish to update any of your Personal Data, we will make those changes upon your request.

3.3. Right to withdraw your consent

At any time, you may withdraw your consent for us to process your Personal Data for the purposes described at Section III of this Privacy Policy. However, this may affect our ability to offer you some of the services. For example, we may not be able to respond to your queries.

4. Your General Rights Regarding Data Collection

4.1. Do Not Track

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to “Do Not Track” signals. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

4.2. Analytics

We may use our own technology or third-party technology to track and analyze usage information to provide enhanced interactions and more relevant communications, and to track the performance of our advertisements.

For example, we use Google Analytics (“Google Analytics”), a web analytics service provided by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. You can learn about Google’s privacy practices by going to www.google.com/policies/privacy/partners/.

Google Analytics uses cookies to help us analyze how our websites are used, including the number of visitors, the websites from which visitors have navigated to our Website, and the pages on our Website to which visitors navigate. This information is used by us to improve our Website. We use Google Analytics with restrictions on how Google can process our data enabled. For information on Google's Restricted Data Processing go to <https://privacy.google.com/businesses/rdp/>.

4.3. Interest-Based Advertising

The companies we work with to provide you with targeted ads are required by us to give you the choice to opt out of receiving targeted ads. Most of these companies are participants of the Digital Advertising Alliance ("DAA") and/or the Network Advertising Initiative ("NAI"). To learn more about the targeted ads provided by these companies, and how to opt out of receiving certain targeted ads from them, please visit: (i) for website targeted ads from DAA participants, <https://www.aboutads.info/choices>; (ii) for app targeted ads from DAA participants, <https://www.aboutads.info/appchoices>; and (iii) for targeted ads from NAI participants, <https://www.networkadvertising.org/choices/>. Opting out only means that the selected participants should no longer deliver certain targeted ads to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., in connection with the participants' other customers or from other technology services).

To opt out of us using your data for Matched Ads, please contact us at contact@transformcx.co.uk and specify that you wish to opt out of matched ads. We will request that the applicable party not serve you matched ads based on information we provide. Alternatively, you may directly contact the applicable party to opt out.

Please note that if you opt out using any of these methods, the opt out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt out options or programs, or the accuracy of any other entities' statements regarding their opt out options or programs.

4.4. E-mails

Depending on the choices you made when providing us with your Personal Data and in compliance with applicable data protection laws, we may send you direct marketing communications. You can opt out of receiving promotional emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link or emailing us at the email address set out in the “Further Information” section below with the word unsubscribe in the subject field of the email. Please note that you cannot opt out of non-promotional emails, such as those about transactions, servicing, or our ongoing business relations.

IX. No Data of Children

The Website is intended for general audiences and is not directed at children. We do not knowingly collect Personal Data (as defined by the U.S. Children's Privacy Protection Act, or “COPPA”) from children. If you are a parent or guardian and believe we have collected Personal Data in violation of COPPA, contacts us at privacyoffice@transformcx.co.uk. We will remove the Personal Data we inadvertently collect in accordance with COPPA. **We do not knowingly “sell,” as that term is defined under US state privacy laws, like CCPA or VCDPA, the Personal Data of minors under 16 years without legally required affirmative consent.**

X. Data Security

We use a variety of methods, such as firewalls, intrusion detection software and manual security procedures for the purpose of securing your data against loss or damage, protecting the accuracy and security of Personal Data, and preventing unauthorized access or improper use. If you think that the Website or any Personal Data is not secure or that there

has been unauthorized access to the Website or your Personal Data, please contact privacyoffice@transformcx.co.uk immediately.

XI. Data Transfers

Due to the international nature of our business, your Personal Data may be transferred outside of your country of residence.

If you are an EU/UK resident, your Personal Data may be transferred to the US or any country which is not considered to have the same level of data protection as in the EU. While in those jurisdictions, your Personal Data may be accessible to regulatory authorities in accordance with the laws of those jurisdictions. However, we ensure all data transfers from the EU comply with applicable legal requirements by executing standard contractual clauses. Should you wish to know more about how your Personal Data is protected or wish to request a copy of the contractual protections please contact privacyoffice@transformcx.co.uk.

XII. Use of cookies, other tracking technology, and social media

Cookies are small pieces of text or code sent to your device when you visit the Website. Cookies are used to optimize the viewing experience, count visitors to a webpage, troubleshoot any problems, keep websites secure, and better serve content. The following cookies are used on the Website:

- Strictly Necessary cookies are required to provide the basic functions of the website and cannot be turned off. They are essential for accessing certain features of the website and could include signing in, adding items to a cart, or e-billing.
- Performance cookies are used to identify the pages used and to measure and track the performance of our website. This helps us to analyze web page traffic

data and improve our website to fit your needs. We only use the information for statistical analysis purposes.

- Functional cookies are used to provide services you request. These cookies can remember your preferences to boost the user experience on a website.
- Targeting cookies may be set by us or by our advertising partners. They may be used to build a profile of your interests and show you relevant advertisements on this website or others. They do not store personal information but are based on uniquely identifying your browser. If you do not allow these cookies, you will experience less relevant advertising.

Overall, cookies help us provide you with a better Website, by enabling us to monitor which pages you find useful and which you do not. ~~You can choose to accept or decline cookies as per the~~ [Cookie Settings manager](#)

~~For more information about the cookies dropped on your device, please review the~~ [Cookie Policy](#)

XIII. Use of social media and social media plug-ins

If you follow us on social media (for example, through our accounts on LinkedIn, Facebook, Twitter or Instagram), We act as a joint controller with the social media platform for the collection of your personal data when you visit our company on the social media platform. We will collect Personal Data about you in order to understand our followers better and understand the public response to our products and services. We may use this information to engage in social listening to identify and assess what is being said about us publicly to understand industry trends and market sentiment. Any information you provide to us when you engage with our content (such as through our brand page or via Facebook Messenger) is treated in accordance with this Privacy Policy. Also, if you publicly reference us or our

Website on social media (such as by using a hashtag associated with us in a tweet or post), we may use your reference on or in connection with our Website.

You can read more regarding our joint controllership with the platforms at the following links:

- YouTube: <https://business.safety.google/controllerterms/>
- LinkedIn: <https://legal.linkedin.com/pages-joint-controller-addendum>
- Facebook: https://www.facebook.com/legal/controller_addendum
- Twitter: <https://gdpr.twitter.com/en/controller-to-controller-transfers.html>
- Instagram: https://www.facebook.com/legal/controller_addendum

We provide social media plug-ins on the Website to allow you to easily share content from our Website through social media, and in doing so, we may receive your Personal Data from the social media platform that you have authorized to share with us. When you share content using these buttons, a new page will pop up from the relevant social media platform. If you're already logged into your account on that social media platform, then you will probably be automatically logged into this pop-up page, so that you don't have to log in again. If, however, you are not logged in (or if you are not registered with the social media platform), the page will ask you for your information.

We have no control over how social media platforms use your Personal Data and they may independently collect information about you when you leave our Website. The information collected and stored by those parties remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to read the privacy notices on the various social media platforms you use.

Find out more about how these social media platforms use your Personal Data:

- [Facebook](#)
- [Twitter](#)

- [YouTube](#) (Google's general privacy policy)
- [Instagram](#)
- [LinkedIn](#)

XIV. Financial Incentive

We do not offer any financial incentives related to our collection of your Personal Data.

XV. Notification of changes

Any changes to this Privacy Policy will be promptly communicated on this page and you should check back to see whether there are any changes. Continued use of the Website after a change in the Privacy Policy indicates your acknowledgement and acceptance of the use of Personal Data in accordance with the amended Privacy Policy. If you wish to save this text, please mark the entire statement (e.g. with your mouse) and copy-paste by pushing ctrl-c.

XVI. Further Information

The content of this Privacy Policy has been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information here, please contact us at privacyoffice@transformcx.co.uk

If you consider that we are not complying with this Privacy Policy, if you have any questions in relation to this Privacy Policy, or have questions about your rights and choices, please contact privacyoffice@transformcx.co.uk. Data subjects in Europe may also lodge a formal complaint with their competent data protection authority.

If you have any questions about our data practices or you wish to exercise your rights or know about the contractual protections in place, please contact the our Chief Data Privacy Officer at privacyoffice@transformcx.co.uk.