



Privacy Policy

HealRWorld LLC is the world's leading source of sustainability information on Small and Mid-Sized businesses globally. Some of the information in our business records may be classified under personal information under various laws such as information relating to an individual (e.g. a sole proprietor, a partnership, a company director, a beneficial owner, a trustee, a professional contact.)

This privacy notice explains how we collect, share and protect business information. This policy covers the following HealRWorld websites: community.healrworld.com, healrworld.com, spec.healrworld.com and edir.healrworld.com and is effective as of June 04, 2019.

These sites may provide links to other non-HealRWorld websites that may have different privacy notices. We encourage you to carefully read the online privacy notices of these other websites to ensure that you understand their practices and the relevant distinctions.

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Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

- **Data controller:** Surya Mangipudi





- **How we collect or obtain information about you:**

- When you provide it to us (e.g. by contacting us, placing an order on our website, and when you sign up to participate in HealRWorld hosted blogs, tutorials, classes and social media, we will collect personally identifiable information in order to establish your profile.) You may choose to make public certain individual profile elements, in which case that information will be available to visitors and possibly to other users of the Internet. Any information that you submit and post may likewise be available to website visitors and viewable to anyone online. Your blog postings will be associated with your username and your voluntarily created public profile. Violation of our Terms of Use agreement may result in the removal of your post(s) and/or the termination of your membership.
- Information Collected Automatically Through Computer Tracking: We also collect information about website visitors such as IP address, browser type, or operating system, areas of the website visited and the website from which a visitor came. We collect and analyze this information for the continued improvement of the Products, Websites, and our business. We routinely use this web log information to administer and improve our website. While some of this information may be traceable to an individual, we only seek to identify individuals (i) whom we believe are using our website for improper purposes, (ii) when necessary to assist them with their user experience, (iii) or to otherwise use the information as described in this policy.

- **Information we collect:**

HealRWorld collects information on businesses and business professionals. We collect information offline from business owners and principals, from sustainability certifiers and verifiers, vendors, third parties and from public records and the Internet. HealRWorld has a right to publish information on businesses that may be a factor in our customers' decision making involving investments, credit, insurance, marketing and other activities.

The business information that we collect includes the following:

- Company and business professional information, including business contact information such as name, title, address, phone number, fax number, and e-mail address, domain names, certifications/verifications and trade associations, industry, sustainability category, keywords;
- Detailed company profiles and statistics, including number of employees, Background information regarding company management, such as beneficial ownership/persons of significant control;
- Company operational histories, including territories, subsidiaries, affiliates, and lines of business;
- Business compliance information from public source government and professional records, media and business publications;
- IP addresses, geolocation, comments on social media is collected and aggregated and used to analyze trends
- Business Credit/debit card information in order to process certain customer payments (but HealRWorld does not store any such data and uses PayPal to process credit cards.)

The personal information we collect includes the following:





Personal information of website visitors and customers including name, contact details, address, telephone number, social media handle, email, employer, job title, industry, IP address, information from cookies, information about your computer or device (i.e. device and browser type), information about how you use our website (i.e. which pages you have viewed), the time when you viewed them and what you clicked on, social media information, what geographical location you accessed our website from—as well as business related data such as company size, sales, industry, sustainability commitments, etc. Personal Credit/debit card information in order to process certain customer payments (but HealRWorld does not store any such data and uses PayPal to process credit cards.)

- HealRWorld analyzes IP addresses of visitors to our websites and match business information from our various databases and received from third parties against the IP addresses to learn more about what types of businesses are visiting our websites and the browsing preferences of such businesses on our websites. We use the information derived from these analytical activities, which may be combined with non-personally identifiable behavioural information received from third parties, to better model and refine our general marketing activities and may, from time to time and to the extent permitted by law, directly market our products and services to these businesses based on the information we have learned about their browsing activities while on our websites.

- **Mobile Devices:** To provide location-based services on the mobile-optimized versions of products, we may collect and use precise location data, including the real-time geographic location of your mobile device or computer. Where available, location-based services may use GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your device’s approximate location.
Location based services, such as the mapping features, require collection of your location for the feature to work. You may withdraw consent to its collection, use, transmission, processing and maintenance of location data at any time by not using the products that use location-based features or by turning off Location Services settings (as applicable) on your device and computer.)

- **How we use your information:** HealRWorld uses the information that we collect to operate our websites, offer customers a variety of business information products and services for use in making business credit, risk management, investment, purchasing/supplier, and marketing decisions, and to carry out transactions that you request or authorize. HealRWorld also licenses professional business contact information to authorized resellers and third-party businesses for marketing and data management purposes.

- We may use your professional business contact information to match it with other public and private sources in order to create anonymous segments of information (this is non-personally identifying information, such as demographic, behavioural and technical information, extracted from the underlying Data) for use by HealRWorld and/or third parties to target advertising messages to you on third-party sites and services. Such segments do not reveal or contain your personal information. You may opt-out from certain targeting advertising by notifying us at customerservice@healworld.com.





- HealRWorld shares information with third-party service providers, such as credit card processors, consultants, and Amazon Web Services in order to support our Internet websites and business operations. HealRWorld contractually requires that these recipients only use the information for the intended purpose of the disclosure and that they destroy or return the information when it is no longer needed. We may also disclose the information as required or appropriate in order to protect our website, business operations or legal rights, or in connection with a sale or merger involving HealRWorld assets or business.
- When necessary or appropriate, we may disclose information in response to a court order, subpoena, law enforcement proceeding, regulatory inquiry or when otherwise legally required.
- **How long we retain your information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business). HealRWorld will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, contact Customer Service at customerservice@healrworld.com. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.
- **How we secure your information:** HealRWorld maintains commercially reasonable security measures to protect personal information against unauthorized access and disclosure and that are consistent with our business operations and generally accepted industry standards. These measures include the implementation of technical, physical and administrative security safeguards. HealRWorld has required our employees and consultants to pass a third-party service provider due diligence program to ensure that our vendors likewise employ adequate data collection, processing, transfer, management and security measures in carrying out their services on our behalf.
- We cannot ensure or warrant the security of any information that you transmit to us and you agree that you provide this information and engage in such transmissions at your own risk. Once we receive information from you, we will endeavour to maintain its security on our systems. HealRWorld has established policies and procedures for securely managing information and protecting data against unauthorized access and we continually assess our data privacy, information management and data security practices. We do this in the following ways:
 - Establishing policies and procedures for securely managing information;
 - Limiting employee access to sensitive information;
 - Protecting against unauthorized access to customer data by using data encryption, authentication and virus detection technology, as required;
 - Conducting background checks on to our team members and consultants;
 - Continually assessing our data privacy, information management and data security practices.
 - Using appropriate technical and organisational measures such as storing your information on secure servers at Amazon Web Services,¹ encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, encrypting payments you make on or via our website using Secure Sockets Layer (SSL) technology, only granting access to your information where necessary.
- **Use of cookies** we use cookies and similar information-gathering technologies such as web beacons and, on our website including essential, functional, analytical and targeting cookies.





For more information, please visit our cookies policy here:
community.healrworld.com/public/admin/cookies-policy.pdf

- **Transfers of your information outside the European Economic Area:** in certain circumstances we might transfer your information outside of the European Economic Area. Where we do so, we will ensure appropriate safeguards are in place, including the third parties we use who transfer your information outside the European Economic Area have self-certified themselves as compliant with the EU-U.S. Privacy Shield.
- **Use of automated decision making and profiling:** we use automated decision making and/or profiling in relation to our website e.g. use of web analytics, cookies, web beacons or server logs analysis tools (profiling) or use targeting cookies to display advertisements to your people who visit your website on other websites around the internet (e.g. using the Google AdSense network). We also use a profiling tool to assist our customers in finding products, services and companies that align with their self-reported values.
- **Your rights in relation to your information:**
 - to access your information and to receive information about its use
 - to have your information corrected and/or completed
 - to have your information deleted
 - to restrict the use of your information
 - to receive your information in a portable format
 - to object to the use of your information
 - to withdraw your consent to the use of your information
 - to complain to a supervisory authority
- **Sensitive personal information:** we do not knowingly or intentionally collect what is commonly referred to as 'sensitive personal information'. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled Sensitive Personal Information.

Our details

The data controller in respect of our website is Surya Mangipudi. You can contact the data controller by writing to Data Controller, HealRWorld LLC, 78 North Bridge Street, Somerville, NJ 08876 or sending an email to suryam@healrworld.com

The data controller's representative is Smita Chitre. You can contact the data controller's representative by writing Data Controller Representative, HealRWorld LLC, 78 North Bridge Street, Somerville, NJ 08876 or sending an email to smitta@healrworld.com

The data protection officer for the data controller is Yash Phatak. You can contact the data protection officer by writing to Data Protection Officer, 78 North Bridge Street, Somerville, NJ 08876 or sending an email to yash@healrworld.com

If you have any questions about this Privacy Policy, please contact the data controller.



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Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Web server log information

We use a third-party server to host our website called Amazon Web Services, the privacy policy of which is available here: <https://aws.amazon.com/privacy/> Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser version and operating system.

Our server is located in the United States and accordingly, your information is transferred outside the European Economic Area (EEA). For further information and information on the safeguards used, please see the section of this privacy policy entitled [Transfers of your information outside the European Economic Area](#).

[Use of website server log information for IT security purposes](#)

We and our third-party hosting provider collect(s) and store(s) server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our hosting provider to make any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

Legal basis for processing: our and Amazon Web Services legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: we and Amazon Web Services have a legitimate interest in using your information for the purposes of ensuring network and information security.

[Use of website server log information to analyse website use and improve our website](#)

We use the information collected by our website server logs to analyse how our website users interact with our website and its features. For example, we analyse the number of visits and unique visitors we receive, the time and date of the visit, the location of the visit and the operating system and browser used.

We use the information gathered from the analysis of this information to improve our website. For example, we use the information gathered to change the information, content and structure of our



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website and individual pages based according to what users are engaging most with and the duration of time spent on particular pages on our website.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: improving our website for our website users and getting to know our website users' preferences so our website can better meet their needs and desires.

Cookies

Cookies are data files which are sent from a website to a browser to record information about users for various purposes.

We use cookies on our website, including essential, functional, analytical and targeting cookies and web beacons. For further information on how we use cookies, please see our cookies policy which is available here: community.hearworld.com/public/admin/cookies-policy.pdf

You can reject some or all of the cookies we use on or via our website by changing your browser settings or non-essential cookies by using our cookie control tool, but doing so can impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org or see our cookies policy.

Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

Email

When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).





Transfer and storage of your information

We use a third-party email provider to store emails you send to us. Our third-party email provider is Microsoft 365 located in the United States. Their privacy policy is available here: _

<https://privacy.microsoft.com/en-US/>

Emails you send us will be stored outside of the European Economic Area on our third-party email provider's servers in the United States where your third-party email provider stores your emails. For further information please see the section of this privacy policy entitled, Transfers of your information outside the European Economic Area. Please note, Microsoft participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework.

Contact form

When you contact us using our contact form, we collect your name, email, address, phone, IP address, title, company, industry etc. We also collect any other information you provide to us when you complete the contact form, including any optional information.

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Messages and data you send us via our contact form will be stored outside the European Economic Area on our third-party hosting, email and CRM provider's servers in the United States. Our third-party email or hosting provider Amazon Web Services, email distribution provider is Mailchimp, and CRM provider is HubSpot--all are located in the United States. Their privacy policies are located here:

<https://aws.amazon.com/privacy/> , <https://mailchimp.com/legal/privacy> ,

<https://legal.hubspot.com/privacy-policy> .

Messages you send to us via our contact form will be stored outside the European Economic Area on our contact form provider's servers in US where are third-party provider stores our emails.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Phone

When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us. We do not record phone calls.



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Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Information we collect when you interact with our website

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

E-Newsletter

When you sign up for our e-newsletter on our website to receive news, offers, etc. from us by signing up to receive such information on our website and entering your name and email address and clicking subscribe or ticking a box at checkout indicating you would like to receive our newsletter, we collect your name, email etc. to deliver such newsletter.

Legal basis for processing: your consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you give your consent to us sending you our e-newsletter by signing up to receive it using the steps described above.





Transfer and storage of your information

We use a third-party service to send out our e-newsletter and administer our mailing list, Mailchimp. Their privacy policy is here: <https://mailchimp.com/legal/privacy/>

Information you submit to subscribe for our e-newsletter will be stored outside the European Economic Area on our third-party mailing list provider's servers in the United States where our third-party email provider stores your subscribers' information (usually where its servers are located). For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Use of web beacons in emails

We use technologies such as web beacons (small graphic files) in the emails we send to allow us to assess the level of engagement our emails receive by measuring information such as the delivery rates, open rates and click through rates. We will only use web beacons in our emails if you have consented to us doing so.

For more information on how we use web beacons in our e-newsletter emails, see our cookies policy which is available here: community.healworld.com/public/admin/cookies-policy.pdf

For more information about our third-party mailing list provider and they use web beacons, please see their privacy policy which is available here: <https://mailchimp.com/legal/privacy/>

Registering on our website

When you register and create an account on our website, we collect the following information: name, email address, profile address, password, IP address, and any other information you provide to us when you complete the registration form, including any optional information like company, industry, phone etc.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: registering and administering accounts on our website to provide access to content and facilitate the running and operation of our business.

Transfer and storage of your information

Information you submit to us via the registration form on our website will be stored outside the European Economic Area on our third-party hosting provider's servers in the United States. Our third-party hosting provider is Amazon Web Services, email provider is Mailchimp, and CRM provider is HubSpot. Their privacy policies are located here: <https://aws.amazon.com/privacy/>, <https://mailchimp.com/legal/privacy/> and <https://legal.hubspot.com/privacy-policy>.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.





Information we collect when you place an order on our website

We collect and use information from individuals who place an order on our website in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Information collected when you place an order

Mandatory information

When you place an order Sustain Planet Earth Committed on our website, we collect your name, business email address, business name, business address, billing address, shipping address, credit card information, company name (if applicable) and phone number.

If you do not provide this information, you will not be able to purchase goods or services from us on our website or enter into a contract with us.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations.

Optional information

We also collect optional information from you, such as your business information. We also ask if you would like to receive marketing communications from us and/or third parties. For further information, see "Marketing Communications" in this section below.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: finding out how a customer heard about us to improve our business' advertising methods or to be able to contact the customer by phone where (if necessary) in relation to their order and provide accurate business information for customers legitimately representing their business or enterprise.

AND/OR

Legal basis for processing: your consent (Article 6(1)(a) of the General Data Protection Regulation). **Legitimate interests:** you consent to us processing any optional information you provide by submitting that information to us.

Processing your payment

After you place an order on our website you will need to make payment for the goods or services you have ordered. In order to process your payment we use PayPal.

Your payment will be processed by PayPal who collects, uses and processes your information, including payment information, in accordance with their privacy policies. You can access their privacy policies via the following link(s): <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>





Transfer and storage of your information

PayPal is located the United States. Information relating to the processing of your payment is stored outside the European Economic Area on our third-party payment processor's servers in the United States.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: to fulfil your contractual obligation to pay for the goods or services you have ordered from us.

Marketing communications

At checkout you will have the option of receiving marketing communications from us.

Our similar goods and services

You can opt-out from receiving marketing communications in relation to our goods and which are similar to those which you purchase from us, by not ticking a box to opt in.

We will send you marketing communications in relation to similar goods and services if you do not opt out from receiving them.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: direct marketing and advertising our products and services.

Transfer and storage of your information

We use a third-party service to administer our mailing list, Mailchimp and our sales CRM, HubSpot.

Information you submit to subscribe for our e-newsletter will be stored outside the European Economic Area on our third-party mailing list provider's servers in the United States. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Use of web beacons in emails

We use technologies such as [web beacons (small graphic files) in the emails we send to allow us to assess the level of engagement our emails receive by measuring information such as the delivery rates, open rates and click through rates which our emails achieve. We will only use web beacons in our emails if you have consented to us doing so.

For more information on how we use web beacons in our emails, see our cookies policy which is available here: community.healworld.com/public/admin/cookies-policy.pdf





For more information about our third-party mailing list providers and web beacons, please see their privacy policy which is available here: <https://mailchimp.com/legal/privacy/> and here: <https://legal.hubspot.com/privacy-policy>

Our goods and services

You can opt in to receiving marketing communications from us in relation to our goods and services by email, text message, phone etc. by ticking a box indicating that you would like to receive such communications.

We will send you marketing communications in relation to our goods and services only if you opt-in to receive them.

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: you give your consent to us sending you information about our goods and services by signing up to receive such information in accordance with the steps described above.

Transfer and storage of your information

We use a third-party service to administer our mailing list, Mailchimp and CRM, HubSpot.

Information you submit to subscribe for our e-newsletter will be stored outside the European Economic Area on our third-party mailing list and CRM provider's servers in the United States. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Information collected or obtained from third parties

This section sets out how we obtain or collect information about you from third parties.

Information received from third parties

We do receive information about you from third parties. The third parties from which we receive information about you will generally include global certifiers/verifiers, data companies, media companies and others.

It is also possible that third parties with whom we have had no prior contact may provide us with information about you.

Information we obtain from third parties will generally be your name and contact details, but will include any additional information about you which they provide to us.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where a third-party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: where you have asked that a third-party to share information about you with us and the





purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third-party in question to pass on your information to us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: where a third-party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.

For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third-party, where the third-party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract.

Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

Where we receive information about you in error

If we receive information about you from a third-party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Information obtained by us from third parties

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as online customer databases, business directories, media publications, social media and websites including healrworld.com/community, edir.healrworld.com and any additional public sources from which you provide information.

In certain circumstances will also obtain information about you from private sources, both EU and non-EU, such as data brokers etc.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard.

For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources. For example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and





processing information about you from such sources in order to investigate and pursue any suspected or potential infringement.

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: we may obtain information from third parties, such as data brokers, where you have consented to them sharing information with us by stating that you would like your information to be share with us.

Our use of automated decision-making and profiling²

We use automated decision making and profiling on our website. We do not consider that this has any legal effect on you or similarly significantly affects you.

You have the right to object to our use of automated decision making and profiling described in this section. You can do that by opting out of cookies and similar technologies in accordance with the method described in the relevant section below. If you do not want us to process your actual IP address when you visit our website, you can use a Virtual Private Network (VPN) or a free service such as Tor.

You can find out more about our use of cookies and similar technologies (including the legal basis on which we use them) and how to opt out from them in our cookies policy, which is available here: community.healrworld.com/public/admin/cookies-policy.pdf

Automated decision making

Automated decision making is decision making by technological means (i.e. by a machine) without human involvement.

Use of automated decision making for [display] advertising

We automate the display advertisements containing our products and services on other websites you visit, you based on the fact that you have visited our website using cookies. For further information on the cookies we use, please see our cookies policy which is available here: community.healrworld.com/public/admin/cookies-policy.pdf

Logic involved: automatically displaying advertisements to individuals who have visited our website results in increased efficiencies and costs savings for us than manually displaying advertisements or displaying advertisements by different means.

Significance and envisaged consequences: cookies will be used to recognise the fact that you have visited our website in order to display advertisements to you (unless you have blocked such cookies) and will collect information about your online behaviour.

How to object: you can block these cookies by blocking third-party cookies using browser settings, or e.g. for Google DoubleClick, by opting out of seeing personalised ads by following the instructions here: <https://support.google.com/ads/answer/2662922?hl=en-GB>. For further information, please see our cookies policy: community.healrworld.com/public/admin/cookies-policy.pdf

Use of automated decision making for business recommendations

We use automated decision making for helping make business and product recommendations based on user preferences.

Logic involved: To increase efficiencies.





Significance and envisaged consequences: to help the user find products, services and companies that align with their values.

How to object do not sign-up for the values-based profile builder

Legal basis for processing: Legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: in certain situations, we will have a legitimate interest in providing product, business and service recommendations to our visitors or customers that have expressed such an interest.

Profiling

Profiling is any form of automated processing of your information to evaluate personal aspects about you, in particular to analyse or predict things like your performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Use of profiling for web analytics

Our web analytics service, e.g. Google Analytics, uses collects information such as your location (based on your IP address) and your behaviour (based on cookies) when you access our website (such as the pages you visit and what you click on). We will only process information from cookies if you have consented to us setting cookies on your computer in accordance with our cookies policy community.healrworld.com/public/admin/cookies-policy.pdf Information collected about you, once collected is anonymised and stored on an aggregate basis.

Logic involved: by automatically analysing and categorising information such as the location (based on IP address) as well as the behaviour and devices of visitors to our website (using cookies), we are able to gain a better understanding of what our website visitors want (in terms of the content of our website and our products), how to improve our website and how to advertise and market our services to them.

Significance and envisaged consequences: cookies will be used to track and store information about your behaviour and device on our website (unless you have opted out from receiving such cookies by opting out from analytical cookies used on our website) and your location will be analysed based on your IP address. We may target advertisements based on the level of interest we receive from certain visitors and their behaviour on our website.

Legal basis for processing: Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: we may have a legitimate interest in better understanding the performance of pages, content and areas of our website to enhance the user experience and better understand which users prefer which attributes.





Use of profiling in marketing emails

We use web beacons in our marketing emails to analyse who opens our emails and what actions they take (for example, what they click on). We will only process information from web beacons if you have consented to their use in accordance with our cookies policy:

community.healworld.com/public/admin/cookies-policy.pdf

Logic involved: by analysing how our email recipients respond to our emails, we are able to improve the content and effectiveness of our emails and gauge who is most interested.

Significance and envisaged consequences: your behaviour when you open our emails will be tracked using small gif files (web beacons including open rates, click through rates, etc).

How to object: Customer or visitors may opt out of our email lists at Mailchimp or through our website.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: analysing the level of engagement and effectiveness of our marketing emails and content.

Disclosure and additional uses of your information

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

and

Disclosure of your information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf].³ These include the following:⁴

- Email marketing provider, Mailchimp. Their privacy policy is available here: <https://mailchimp.com/legal/privacy/>
- CRM provider, HubSpot. Their privacy policy is available here: <https://legal.hubspot.com/privacy-policy>
- Hosting provider, Amazon Web Services. Their privacy policy is available here: <https://aws.amazon.com/privacy/>
- Online Payment provider, PayPal. Their privacy policy is available here: <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>
- Email Hosting provider, Microsoft. Their privacy policy is available here: <https://privacy.microsoft.com/en-us/privacystatement>

Our third-party service providers are located in the United States.

Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

We do not display the identities of all of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us directly via our contact form or customerservice@healworld.com and we





will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example).

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest relied on: where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

Legal basis for processing: necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to third parties such as Google Inc. Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: <https://www.google.com/policies/privacy/partners/>.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): meeting our contractual obligations to Google under our Google Analytics Terms of Service (<https://www.google.com/analytics/terms/us.html>).

You can opt out of Google Analytics by installing the browser plugin here:

<https://tools.google.com/dlpage/gaoptout>

Transfer and storage of your information

Information collected by Google Analytics is stored outside the European Economic Area on Google's servers in the United States of America.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.]

Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties include our business partners, independent contractors, etc. Further information on each of these third parties is set out below.





Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: running and managing our business efficiently.

Business partners

Business partners are businesses we work with which provide goods and services which are complementary to our own or which allow us to provide goods or services which we could not provide on our own. We share information with our business partners where our customers have requested services which they provide whether independently from, or in connection with our own services.

Independent contractors

Occasionally, we use independent contractors in our business. Your information will be shared with independent contractors only where it is necessary for them to perform the function we have hired them perform in relation to our business.

Our independent contractors are technology developers and subject to HealRWorld screening for data security standards, criminal record check, etc. by a third-party verifier.

Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that we fraud or a cybercrime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: preventing crime or suspected criminal activity (such as fraud).

In connection with the enforcement or potential enforcement our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).





Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third-party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one or to the National Crime Agency in connection with suspected or potential money laundering matters.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation(s): legal obligations to disclose information which are part of the laws of New Jersey or the United States.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the state of New Jersey or the United States, we have a legitimate interest in complying with these obligations.

How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Data Retention

HealRWorld will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, contact Customer Service at customerservice@healrworld.com. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:





- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website and any payment transactions you make on or via our website;
- only transferring your information via closed system or encrypted data transfers.

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Transfers of your information outside the European Economic Area

Your information will be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below. We will also transfer your information outside the EEA or to an international organisation in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

Server log information

Information collected when you visit our website is transferred outside of the EEA and stored on the servers of our third-party hosting company, Amazon Web Services. You can access their privacy policy here: <https://aws.amazon.com/privacy/>

Country of storage: United States. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third-party hosting provider has self-certified its compliance with the EU-U.S. Privacy Shield.

Contact form

Information you submit to us via our contact form is transferred outside the EEA and stored on our third-party hosting **and/or** our email and CRM provider's servers. Our hosting provider is Amazon Web Services, email provider is Mailchimp, and CRM provider is HubSpot respectively. You can access their privacy policy here:





Hosting provider, Amazon Web Services. Their privacy policy is available here:
<https://aws.amazon.com/privacy/>

Email provider, Mailchimp. Their privacy policy is available here:
<https://mailchimp.com/legal/privacy/>

CRM provider, HubSpot. Their privacy policy is available here:
<https://legal.hubspot.com/privacypolicy>

Country of storage: United States. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third-party hosting provider **AND** third-party email provider have self-certified their compliance with the EU-U.S. Privacy Shield to transfer information to a country which is outside the EEA (see Appendix 1 for the full list).

Email

Information you submit to us via our contact form is transferred outside the EEA and stored on our third-party hosting And/or our email provider's servers. Our hosting provider is Amazon Web Services, email provider is Mailchimp, and CRM provider is HubSpot respectively. You can access their privacy policy here:

Hosting provider, Amazon Web Services. Their privacy policy is available here:
<https://aws.amazon.com/privacy/>

Email provider, Mailchimp. Their privacy policy is available here:
<https://mailchimp.com/legal/privacy/>

CRM provider, HubSpot. Their privacy policy is available here:
<https://legal.hubspot.com/privacy-policy>

Country of storage: United States. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third-party hosting provider, third-party email provider and CRM provider have self-certified their compliance with the EU-U.S. Privacy Shield to transfer information to a country which is outside the EEA (see Appendix 1 for the full list).

E-Newsletter

Information you submit to us via our e-newsletter registration is transferred outside the EEA and stored on our third-party hosting And/or our email provider's servers. Our hosting provider and, email provider is Amazon Web Services and Mailchimp respectively. You can access their privacy policy here:

- Hosting provider, Amazon Web Services. Their privacy policy is available here:
<https://aws.amazon.com/privacy/>
- Email provider, Mailchimp. Their privacy policy is available here:
<https://mailchimp.com/legal/privacy/>

Country of storage: United States. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third-party hosting provider AND third-party email provider have self-certified their compliance with the EU-U.S. Privacy Shield to transfer information to a country which is outside the EEA (see Appendix 1 for the full list).





Google Analytics

Information collected by Google Analytics (your IP address and actions you take in relation to our website) is transferred outside the EEA and stored on Google's servers. You can access Google's privacy policy here: <https://www.google.com/policies/privacy/>

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Google has self-certified its compliance with the EU-U.S. Privacy Shield which is available here: <https://www.privacyshield.gov/welcome>. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

PayPal

Information you submit to us to us to facilitate an online payment and the item purchased or company invested in is transferred outside the EEA and stored on our web hosting servers. Our storage provider is Amazon Web Services. We do not process or store your credit card data which is processed by PayPal. You can access their privacy policy here: <https://www.paypal.com/us/webapps/mpp/ua/privacyfull> .

Country of storage: United States. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: PayPal has upgraded its privacy statements and safeguards. See their privacy policy here: <https://www.paypal.com/uk/webapps/mpp/ua/upcoming-policies-full>

Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to HealRWorld LLC, 78 North Bridge Street, Somerville, NJ 08876 or sending an email to customerservice@healworld.com.

- **to your information** and information related to our use and processing of your information;
- **to request the correction or deletion** of your information;
- **to request that we restrict our use** of your information;
- **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third-party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this

will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.





In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: http://ec.europa.eu/justice/dataprotection/reform/files/regulation_oj_en.pdf

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your right to object to the processing of your information for certain purposes

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by writing to HealRWorld LLC, 78 North Bridge Street, Somerville, NJ 08876 or customerservice@healrworld.com

- to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and





- to object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

- **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link;
- **sending an email** to customerservice@healworld.com asking that we stop sending you marketing communications or by including the words "OPT OUT".

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled [How to accept or reject cookies](#) in our cookies policy, which is available here: community.healworld.com/public/admin/cookies-policy.pdf

Sensitive Personal Information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.





Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third-party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to customerservice@healworld.com.

California Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit www.allaboutdnt.org

At this time, we do not respond to Do Not Track browser settings or signals. In addition, we use other technology that is standard to the internet, such as pixel tags, web beacons, and other similar technologies, to track visitors to the website. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal. For information on how to opt out from tracking technologies used on our website, see our cookies policy which is available here: community.healworld.com/public/admin/cookies-policy.pdf

Copyright, credit and logo

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>

The copyright in this Privacy Policy is either owned by, or licensed to, us and is protected by copyright laws around the world and copyright protection software. All intellectual property rights in this document are reserved.

Where we display the GDPR Privacy Policy logo on our website, this is used to indicate that we have adopted a privacy policy template provided by GDPR Privacy Policy as the basis for this Privacy Policy.





Appendix 1

Safeguards for overseas transfers

EU-U.S. Privacy Shield, an approved certification mechanism under Article 42 of the General Data Protection Regulation. This is permitted under Article 46(2)(f) of the General Data Protection

Regulation. You can access the EU-U.S. Privacy Shield: <https://www.privacyshield.gov/welcome> and the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm.

1) Amazon Web Services

<https://www.privacyshield.gov/participant?id=a2zt0000000TOWQAA4&status=Active>

2) Google LLC

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

3) HubSpot

<https://www.privacyshield.gov/participant?id=a2zt0000000TN8pAAG&status=Active>

4) Mailchimp

<https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG&status=Active>

5) Microsoft Corporation

<https://www.privacyshield.gov/participant?id=a2zt0000000KzNaAAK&status=Active>

