



# ContourGlobal

## Privacy Statement for External Website

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All rights reserved. This document and the information it contains is subject to the terms and conditions of the agreement or contract under which the document was supplied to the recipient's organization.

None of the information contained in this document **should be** disclosed outside of the recipient's own organization without prior written permission of ContourGlobal unless the terms of such agreement expressly allow.

In the event of a conflict between this document and a relevant law or regulation, the relevant law or regulation **must be** followed. If the document creates a higher obligation, it **must be** followed if this also achieves full compliance with the law or regulation.

## Use of language

Throughout this document, the words '**may**', '**should**' and '**must**' when used in the context of actions of ContourGlobal or others, have specific meanings as follows:

1. '**May**' is used where alternatives are equally acceptable.
2. '**Should**' is used where a provision is preferred.
3. '**Must**' is used where a provision is mandatory.

Note that alternative or preferred requirements **may be** qualified by ContourGlobal in another referenced document.

ContourGlobal and the companies in which it directly or indirectly owns investments are separate and distinct entities. In this publication, however, the collective expression '**ContourGlobal**', **the 'Company'** or '**CG**' **may be** used for convenience where reference is made in general to those companies. Likewise, the words '**we**', '**us**', '**our**' and '**ourselves**' are used in some places to refer to ContourGlobal in general. These expressions are also used where no useful purpose is served by identifying any particular company or companies.

## SCOPE OF THE PRIVACY STATEMENT FOR EXTERNAL WEBSITE

This Privacy Statement for External Website (the “**Policy**”) applies globally to all who access the **contourglobal.com** website.

The Owner and Data Controller for the purposes of this Policy and any applicable data protection laws is as follows:

ContourGlobal – Company No. 10982736  
Tintagel House, 92 Albert Embankment, 6<sup>th</sup> Floor  
London, SE1 7TY

**Owner contact email:** [privacy@contourglobal.com](mailto:privacy@contourglobal.com)

## DEFINITIONS

The following definitions apply for purposes of this Policy:

**Personal Data (or Data):** Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

**Usage Data:** Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

**User:** the individual using this Application who, unless otherwise specified, coincides with the Data Subject.

**Data Subject:** the natural person to whom the Personal Data refers.

**Data Processor (or Processor):** the natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

**Data Controller (or Owner):** the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

**This Application:** the means by which the Personal Data of the User is collected and processed.

**Service:** the service provided by this Application as described in the relative terms (if available) and on this site/application.

**European Union (or EU):** unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

**Cookie:** cookies are Trackers consisting of small sets of data stored in the User's browser.

**Tracker:** indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

## 1.0 SUMMARY

When you visit ContourGlobal's website at [contourglobal.com](http://contourglobal.com), we automatically collect data from you and utilize trusted partners to process that data. The purpose of this Policy is to inform Users about how their personal data is collected, used, stored and protected when they interact with the Company's website.

## 2.0 TYPE OF DATA COLLECTED

2.1. Among the types of Personal data that this Application collects, by itself or through third parties, there are:

- Usage Data
- date of birth
- Trackers
- number of Users
- session statistics
- email address
- first name
- last name
- address
- contact details
- phone number
- page views
- interests
- gender
- unique device identifiers for advertising (Google Advertiser ID or IDFA, for example)
- device information
- search history
- answers to questions
- clicks
- keypress events
- motion sensor events
- mouse movements
- scroll position
- touch events

2.2. Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

2.3. Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this

Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service

- 2.4 Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner
- 2.5 Any use of Cookies – or of other tracking tools — by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.
- 2.6 Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

## 3.0 DATA PROCESSING

### 3.1. Methods of Processing

- 3.1.1. The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.
- 3.1.2. Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner.
- 3.1.3. The updated list of these parties may be requested from the Owner at any time.

### 3.2 Place of Processing

- 3.2.1. The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.
- 3.2.2. Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own.
- 3.2.3. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### 3.3 Retention Time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

### 3.4 Purposes of Processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following:

- Building, running, and improving this Application
- Analytics
- Displaying content from external platforms
- Tag management
- Contacting the User

- Advertising
- Spam and bots protection
- Remarketing and behavioral targeting
- Change in control activity
- Comply with or fulfill obligations under applicable law
- Enforcing this Privacy Policy and other agreements

## 4.0 DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

### 4.1 Advertising

- 4.1.1 This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Application, possibly based on User interests.
- 4.1.2 This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.
- 4.1.3 Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Application.
- 4.1.4 For more information, please check the privacy policies of the relevant services. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document

### 4.2 Google Ads Enhanced Conversions

Google Ads enhanced conversions is an advertising service provided by Google LLC that allows the Owner to send hashed first-party conversion Data to Google in order to improve conversion measurements.

Personal Data processed:

- address
- contact details
- email address
- first name
- last name
- phone number
- Trackers

Service provided by:

- Google LLC (United States) — [Privacy Policy](#)

### 4.3 Google Ads Audience Expansion

Google Ads Audience Expansion is an advertising service provided by Google LLC that allows the Owner to expand the available target audience by finding Users who have interests, demographics or online behavior similar to an existing audience selected by the Owner. Users can opt out of Google's use of personalized advertising by visiting Google's [Ads Settings](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

**Personal Data processed:**

- gender
- interests
- page views
- Usage Data

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#)

#### 4.4 Google Ads Customer Match

Google Ads Customer Match is an advertising service provided by Google LLC that allows matching Data that Users have shared with the Owner to existing Google accounts in order to target them or similar Users with personalized ads. Users can opt out of Google's use of personalized advertising by visiting Google's [Ads Settings](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

**Personal Data processed:**

- Trackers
- unique device identifiers for advertising (Google Advertiser ID or IDFA, for example)

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#)

#### 4.5 Google Ads Optimized Targeting

Google Ads Optimized Targeting is an advertising service provided by Google LLC that allows the Owner to optimize the available target audience by finding new Users who have interests, demographics or online behaviour similar to Users who have recently engaged with the Owner's content and ads.

Users can opt out of Google's use of personalized advertising by visiting Google's [Ads Settings](#).

**Personal Data processed:**

- gender
- interests
- page views
- Usage Data

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#)

#### 4.6 Google Ads Smart Bidding

Google Ads Smart Bidding is an advertising service provided by Google LLC that maximizes conversions by using various bidding strategies. These strategies may include optimizing bids based on Customer Match lists as well as the User's device information and behavioral activity. Users can opt out of Google's use of personalized advertising by visiting Google's [Ads Settings](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

**Personal Data processed:**

- device information
- page views
- search history

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#)

## 4.7 Google Ads Similar Audiences

Similar Audiences is an advertising and behavioral targeting service provided by Google LLC that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of this Application. On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising Trackers by going to: Google [Ad Settings](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

**Personal Data processed:**

- Trackers
- Usage Data

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#) – [Opt out](#)

## 5.0 ANALYTICS

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

### 5.1 Google Analytics 4

Google Analytics 4 is a web analysis service provided by Google LLC (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google's official documentation](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

**Personal Data processed:**

- number of Users
- session statistics
- Trackers
- Usage Data

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#) – [Opt out](#)

## 5.2 User ID Extension for Google Analytics

Google Analytics on this Application makes use of a feature called User ID. This setup allows for a more accurate tracking of Users by associating that User with the same ID over various sessions and devices. It is set up in a way that doesn't allow Google to personally identify an individual or permanently identify a particular device. The User ID extension might make it possible to connect Data from Google Analytics with other Data about the User collected by this Application. The opt-out link below will only opt you out for the device you are on, but not from tracking performed independently by the Owner. Contact the Owner via the email address provided in this privacy policy to object to the aforementioned tracking as well.

**Personal Data processed:**

- Trackers

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#) – [Opt Out](#)

## 5.3 Google Analytics Advertising Reporting Features

Google Analytics on this Application has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's [Ads Settings](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

**Personal Data processed:**

- Trackers
- unique device identifiers for advertising (Google Advertiser ID or IDFA, for example)
- various types of Data as specified in the privacy policy of the service

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#) – [Opt Out](#)

## 6.0 BUILDING AND RUNNING THIS APPLICATION

### 6.1 Key components of this Application are built and run directly by the Owner by making use of the software listed below.

**Personal Data processed:**

- Trackers
- unique device identifiers for advertising (Google Advertiser ID or IDFA, for example)
- various types of Data as specified in the privacy policy of the service

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#) – [Opt Out](#)

## 6.2 WordPress (self-hosted)

This Application is built and run by the Owner via a CMS software (Content Management System) called WordPress.

**Personal Data processed:**

- date of birth
- Usage Data

**Service provided by:**

- this Application

## 7.0 CONTACTING THE USER

### 7.1 Mailing List or Newsletter

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

**Personal Data processed:**

- email address
- Trackers
- Usage Data

### 7.2 Contact Form

By completing the contact form with their information, the User authorizes this Application to use these details to respond to the inquiries (like quotes, and any other requests).

**Personal Data processed:**

- email address
- Usage Data

## 8.0 DISPLAYING CONTENT FROM EXTERNAL PLATFORMS

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them. Such services are often referred to as widgets, which are

small elements placed on a website or app. They provide specific information or perform a particular function and often allow for user interaction.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

## 8.1 Google Fonts

Google Fonts is a typeface visualization service provided by Google LLC that allows this Application to incorporate content of this kind on its pages.

**Personal Data processed:**

- Trackers
- Usage Data

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#)

## 8.2 Google Maps Widget

Google Maps is a maps visualization service provided by Google LLC that allows this Application to incorporate content of this kind on its pages.

**Personal Data processed:**

- Trackers
- Usage Data

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#)

# 9.0 REMARKETING AND BEHAVIOURAL TARGETING

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User. This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

## 9.1 Google Ads Remarketing

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC that connects the activity of this Application with the Google Ads advertising network and the DoubleClick Cookie.

In order to understand Google's use of Data, consult [Google's partner policy](#).

Users can opt out of Google's use of Trackers for ads personalization by visiting Google's [Ads Settings](#).

**Personal Data processed:**

- Trackers
- Usage Data

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#) – [Opt out](#)

## 9.2 Remarketing with Google Analytics

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC that connects the tracking activity performed by Google Analytics and its Trackers with the Google Ads advertising network and the Doubleclick Cookie.

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

**Personal Data processed:**

- Trackers
- Usage Data

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#) – [Opt Out](#)

## 10.0 SPAM AND BOT PROTECTION

This type of service analyses the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from unwanted parts of traffic, messages and content that are recognized as spam or protecting it from malicious bots activities.

**Google reCAPTCHA** is a SPAM protection service provided by Google LLC. The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

**Personal Data processed:**

- answers to questions
- clicks
- keypress events
- motion sensor events
- mouse movements
- scroll position
- touch events
- Trackers
- Usage Data

**Service provided by:**

Google LLC (United States) – [Privacy Policy](#)

## 11.0 TAG MANAGEMENT

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralised fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

**Google Tag Manager** is a tag management service provided by Google LLC.

In order to understand Google's use of Data, consult their [partner policy](#) and their [Business Data page](#).

**Personal Data processed:**

- Trackers
- Usage Data

**Service provided by:**

- Google LLC (United States) – [Privacy Policy](#)

## 12.0 COOKIE POLICY

**Information on opting out of interest-based advertising**

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

**Cookie Policy**

This Application uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## 13.0 FURTHER INFORMATION FOR USERS IN THE EUROPEAN UNION

**Legal Basis of Processing:** the Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract

## 14.0 FURTHER INFORMATION ABOUT RETENTION TIME

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## 15.0 COLLECTION AND USE OF SENSITIVE INFORMATION

We have collected the following categories of sensitive personal information from consumers within the last twelve months:

- Mail, email, or text message contents

We do not use or disclose sensitive personal information for purposes other than those specified in the CCPA/CPRA.

## 16.0 YOUR CHOICES

You can choose whether or not to provide personal information through this Application. We will not discriminate against you for exercising any of your rights relating to your personal information and will not (i) deny you goods or services, (ii) provide you with a different level or quality of services, or (iii) charge you different prices for services for doing so.

Any information you send to us electronically, while using the Application or otherwise interacting with us, may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us.

Please be aware, despite our best efforts, no security measures are perfect or impenetrable, and we cannot guarantee “perfect security.” Any information you send us through any means is transmitted at your own risk.

## 17.0 “DO NOT TRACK” (DNT) AND UNIVERSAL OPT-OUT PREFERENCE SIGNALS

Some web browsers (including Safari, Internet Explorer, Firefox, and Chrome) incorporate a “Do Not Track” (DNT) or similar feature that signals to web services that a visitor does not want to have their online activity and behavior tracked. If a web service operator elects to respond to a particular DNT signal, the web service operator may refrain from collecting certain personal information about the browser’s user. Not all browsers offer a DNT option and there is currently no industry consensus as to what constitutes a DNT signal. For these reasons, many web service operators, including us, do not proactively respond to DNT signals. For more information about DNT signals, visit <https://fpf.org/thank-you-for-visiting-allaboutdnt-com/>.

New standards are being developed for a Universal Opt-Out Mechanism, such as the Global Privacy Control (GPC), which allow users with GPC-enabled browsers and devices to send a signal that will communicate the user’s request to opt-out of sales of their personal information and to opt-out of certain sharing of their personal information. The CPRA and other laws allow for the acceptance of Opt-Out Preference Signals such as the GPC, as an option for users to transmit an Opt-Out of selling/sharing personal information. If we detect and recognize such a signal from your device or browser, we will honor it.

## Legal information

This privacy policy relates solely to this Application, if not stated otherwise within this document.

### How can we help?

#### *What you can do*

- Ask us to know and access the information we hold on you
- Ask us to correct information we hold on you
- Ask us to be forgotten (delete the information we hold on you)
- Ask to port your data to another service
- Manage your privacy preferences

#### *In case of issues*

While we strive to create a positive user experience, we understand that issues may occasionally arise between us and our users.

If this is the case, please feel free to contact us at [privacy@contourglobal.com](mailto:privacy@contourglobal.com)

## APPENDIX 1 – CALIFORNIA PRIVACY RIGHTS

In the preceding twelve (12 months, we collected and disclosed for a business purpose the following categories of personal information about California consumers:

| Category  | Examples   | Collected? | Categories of Recipients                          |
|---|--|------------|---|
| Identifiers   | Name, address, e-mail address, IP address  | Yes        | Organizations providing services to ContourGlobal |
| Personal information categories listed in the California Customer Records statute | Name, professional-related information; and employment-related information   | Yes        | Organizations providing services to ContourGlobal |
| Protected classification characteristics under California or federal law          | Name, age, citizenship, nationality, ancestry, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, proof of eligibility to work | No         |   |
| Commercial information  | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.   | Yes        | Organizations providing services to ContourGlobal |
| Internet or other similar network activity  | Browsing history, search history, information on a consumer's interaction with the Service   | Yes        | Organizations providing services to ContourGlobal |
| Geolocation data  | Location and movement data   | No         |   |
| Professional or employment-related information                                    | Proof of eligibility to work, resumé, other professional-related information and employment-related information  | Yes        | Organizations providing services to ContourGlobal |
| Biometric information   | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.      | No         |   |

| Category                         | Examples  | Collected? | Categories of Recipients |
|----------------------------------|---|------------|--------------------------|
| Non-Public Education Information | Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records | No         |                          |
| Inferences from the foregoing    | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.   | No         |                          |

**Purposes for Collection, Use, and Sharing.** We use and disclose the personal information we collect for our commercial purposes, as further described in this Privacy Policy, including for our business purposes with our partners and service providers as follows:

- Legal compliance and auditing related to our interactions with you.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and exercising our related rights.
- Performing and improving our services (by us or our service provider(s)).
- Internal operations.
- Other one-time or short-term uses.

**Your Rights.** If you are a California resident you may have the following rights under the CCPA/CPRA in relation to personal information we have collected about you, to the extent required by the CCPA/CPRA and subject to verification:

- Right to Know/Access: You have the right to request certain information about our collection and use of personal information about you as described below:
  - The specific pieces of your personal information collected.
  - The categories of your personal information collected.
  - The categories of sources from whom your personal information is collected.
  - The purpose for collecting your personal information.
  - The categories of third parties with whom we have shared your personal information.
- Right to Delete: You have the right to request that we delete certain personal information we have about you.
- Freedom from Discrimination: You have the right to be free from unlawful discrimination for exercising any of your privacy rights.
- Right to Correct: You have the right to request that we correct inaccurate personal information regarding the information you provide us.
- Right to Restrict the Use of Sensitive Personal Information: You have the right to restrict the use of your sensitive personal information.
- Right to Access Information on Automated Decision-Making: You have the right to access information collected through automated decision-making. Additionally, you can opt-out of our use of automated decision-making related to your personal information.

To make a request in relation to the above rights, please contact us. To fulfil your request, we will need to verify your identity. Only you or someone legally authorized to act on your behalf may make a request related to your personal information. To designate an authorized agent, the authorized agent must provide sufficient information that allows us to reasonably verify that you authorize them to act on your behalf.

### **Information Provided on Behalf of Children and Others**

The Service are not intended for use by children. Individuals under the age of 18 may not use the Service. We do not knowingly collect any information from children. If you are under 18, do not attempt to register for the Service or send us any personal information. By accessing, using and/or submitting information through the Service, you represent that you are not younger than 18 and that you have authority to do so. If you are a parent or legal guardian of a minor child, you may, in compliance with this Privacy Policy, use the Service on behalf of such minor child. Information you provide through the Service on behalf of a minor child will be treated as personal information as provided herein. If you use the Service on behalf of another person, regardless of age, you represent and warrant that you have authority to do so.

### **Artificial Intelligence & Automated Decision-Making**

We may employ artificial intelligence (AI) technologies ("AI Systems") to enhance the performance and functionality of the Service which includes tailoring your experience through automated processing based on your activity using the Service. The AI Systems work by analyzing your usage patterns, preferences, and other interactions within our services to predict your interests and preferences. The insights gathered allow us to improve our service offerings, provide personalized content and advertising, and enhance user satisfaction.

By using the Service, you consent to the use of AI as described in this Privacy Policy. We encourage you to review your privacy settings regularly to ensure they continue to reflect your preferences.

For more information on your rights and how we use AI, or if you have any concerns about automated decision-making processes, please contact us at [privacy@contourglobal.com](mailto:privacy@contourglobal.com) .

### **Data Collection by AI Systems**

Our AI Systems may collect data that you provide directly or indirectly through your interactions with the Service. The data collected may include, but is not limited to:

- Usage data, such as the pages you visit, the links you click on, and the searches you conduct on our platform.
- Device and connection information, including your IP address, browser type, language, and cookies that uniquely identify your browser or account.
- Location information, determined through data such as your IP address or device's GPS signal.

### **Automated Decisions**

Our AI Systems may make automated decisions including:

- Content curation and recommendations based on user preferences and historical activity.
- Fraud detection and prevention through behavior analysis to identify and flag unusual activity that deviates from typical usage patterns.

### **User Rights and Control**

You have the right to:

- Obtain an explanation of any automated decision and challenge its basis.

- Opt-out of certain uses of your data, including profiling activities for personalized content or advertising.
- Access the personal data that the AI Systems use or contribute to, and request rectification or erasure of such data.
- Receive information about the logic involved in any automated decisions, as well as the significance and the envisaged consequences of such processing for you.

### **Safeguards and Oversight**

We are committed to using AI responsibly. To this end, we implement the following safeguards:

- Regular auditing of our AI Systems for accuracy, fairness, and effectiveness.
- Human oversight to monitor AI decision-making and intervene as necessary to address anomalies or biases.
- Compliance with privacy regulations, ensuring that data used by AI is processed lawfully, transparently, and securely.

## APPENDIX 2 – E.U. AND U.K. GENERAL PRIVACY RIGHTS

If our processing of your personal information is subject to EU GDPR, and/or UK GDPR, and unless subject to an exemption, you may have the following rights with respect to your personal information.

### **The rights of Users based on the EU General Data Protection Regulation (EU GDPR) and UK General Data Protection Regulation**

Users may exercise certain rights regarding their Data processed by the Owner. Specifically, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.
- **Right to Object to Automated Processing.** Users have the right to object to decisions being made with their personal information solely based on automated decision making or profiling.

We will need to verify your identity to process any requests described in this Section and may deny your request if we are unable to verify your identity. Government or other identification may be required. If you are a resident of the European Economic Area ("EEA"), when we process your personal information, we will only do so in the following situations:

- We need to use your information to perform our responsibilities under our agreement with you.
- We have a legitimate interest in processing your personal information. For example, we may process your personal information to send you marketing communications, to communicate with you about the Service, and to provide and improve the Service.
- We have your consent to do so.

If your personal data is subject to EU GDPR or UK GDPR, we will transfer personal data from the EEA to a location outside the EEA only when there has been a documented adequacy determination, or where we have confirmed adequate privacy protections. If we transfer personal data to a third party acting as our agent, we will also obligate the third party to have adequate privacy protections in place.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organisation governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

#### **Details about the right to object to processing**

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

#### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

#### **Additional information about Data collection and processing**

##### *Legal action*

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

##### *Additional information about User's Personal Data*

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

##### *System logs and maintenance*

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

##### *Information not contained in this policy*

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

*Changes to this privacy policy*

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## APPENDIX 3 – MEXICO PRIVACY NOTICE

### ("AVISO DE PRIVACIDAD MEXICO")

Mediante el presente Aviso de Privacidad (en adelante el “Aviso”), y en atención a las disposiciones contenidas en la Ley Federal de Protección de Datos Personales en Posesión de los Particulares, su Reglamento y disposiciones relacionadas vigentes en México (en conjunto, la “Ley”), así como los principios del Reglamento General de Protección de Datos (GDPR), se describen los términos en los que se obtendrán, usarán, divulgarán o almacenarán (en adelante, cualquiera de dichas acciones en lo individual o en conjunto, el “Tratamiento”) los Datos Personales (según se define más adelante) que tú (el “Titular”) por cualquier medio nos proporciones.

ContourGlobal Servicios Administrativos de Generación, S. de R.L. de C.V., ContourGlobal Servicios Operacionales de México, S. de R.L. de C.V. y sus filiales y subsidiarias en México (en conjunto “ContourGlobal México” o “nosotros”, indistintamente) designan a ContourGlobal Servicios Administrativos de Generación, S. de R.L. de C.V. como Responsable, según dicho término se define en la Ley, quien señala como domicilio para todos los efectos y obligaciones relacionadas con el presente Aviso el ubicado en Av. Ricardo Margain 335, Col. Valle del Campesino en San Pedro Garza García, Nuevo León C.P. 66265 (Torre Equus II, Piso 12).

En ContourGlobal México sabemos que la privacidad es muy importante para usted, debido a esto y cumpliendo con la Ley, ponemos el presente Aviso de Privacidad a disposición de todos nuestros clientes, empleados, proveedores y en general, a cualquier persona física o moral (Titulares) de quien(es) ContourGlobal México ha recibido o podría recibir información concerniente a su persona (en lo sucesivo “Datos Personales”), con el objetivo de informarle sobre el tratamiento que se les dará a sus Datos Personales. En el presente Aviso se describe cómo realizaremos el Tratamiento y protegemos tus Datos Personales.

Nos comprometemos a recabar solo los datos necesarios para las finalidades establecidas en este aviso, minimizando la cantidad de información personal que solicitamos.

#### FINALIDADES DEL TRATAMIENTO DE LOS DATOS PERSONALES

Los fines para los cuales ContourGlobal México utiliza sus Datos Personales (de manera enunciativa, más no limitativa), son los siguientes:

a. Recursos Humanos: Esta finalidad se hace referencia a actividades tales como ingresar a la bolsa de trabajo, emitir recomendaciones como posible candidato, consultar su información en fuentes de acceso público, elaboración de su expediente personal, la administración de personal, la administración del plan de beneficios local ó global, la seguridad de nuestras instalaciones.

b. Datos necesarios para la prestación del Servicio: Los datos personales recogidos por el servicio se utilizarán principalmente para la prestación del propio Servicio. Utilizamos estos datos únicamente para los fines

descritos en el presente Aviso de Privacidad. Dado que no podemos prestar dichas funcionalidades o servicios sin los datos solicitados, su recogida y tratamiento se basan específicamente en dicha necesidad. Por lo tanto, utilizaremos, por ejemplo: Datos técnicos básicos (como dirección IP, navegador y tipo de dispositivo) para permitirle acceder al Sitio Web; Datos de contacto para permitirle contactar con nuestros canales de contacto de correo electrónico disponibles; y Datos de contacto a través de una solicitud para establecer comunicación y negociar una posible colaboración con posibles proveedores y generadores de energía que tengan este interés.

c. Datos necesarios para comunicación y publicidade: Algunos datos se recopilan y utilizan para permitir la comunicación entre usted y ContourGlobal México a través de los canales disponibles en el Sitio Web y para el envío, por ejemplo, de boletines informativos y noticias sobre nuestros productos y servicios. Usted puede darse de baja de la recepción de mensajes institucionales sobre nuestros productos y servicios, de la recepción del boletín de noticias e incluso de otro tipo de comunicaciones en cualquier momento poniéndose en contacto con nosotros en [datospersonalesgmexico@contourglobal.com](mailto:datospersonalesgmexico@contourglobal.com). La recogida y tratamiento de estos datos se basa, en particular, en la satisfacción de dichos intereses legítimos de ContourGlobal México y del propio Usuario, cuando manifiesta su interés en dichas comunicaciones al utilizar el Servicio y sus funcionalidades.

d. Datos recogidos para mejorar el Servicio y soporte técnico: Podemos utilizar, por ejemplo, la información técnica recopilada de su dispositivo para facilitar el proceso de soporte y proporcionar asistencia técnica en caso de error o mal funcionamiento del Servicio. También utilizamos los datos recogidos, principalmente, pero no exclusivamente, del uso del Servicio y la información técnica de su dispositivo para mejorar el propio Servicio añadiendo funcionalidades o mejorando otros aspectos del mismo y su navegabilidad. Dicho uso de los datos se basa en un interés legítimo de ContourGlobal México en ofrecerle la mejor experiencia posible en el Sitio Web.

e. Cumplimiento de la Ley: Esta finalidad hace referencia al Tratamiento de Datos Personales de los Titulares según sea necesario para realizar una actividad tendiente a dar cumplimiento a una obligación o requerimiento legal, o a una recomendación de autoridad de la cual ContourGlobal México, sus filiales o subsidiarias sean sujetos, incluyendo la revelación de Datos Personales a autoridades de gobierno o supervisoras, tales como autoridades fiscales.

#### **Base Legal para el Tratamiento de Datos:**

**Consentimiento:** En los casos en que se requiera su consentimiento explícito para el tratamiento de datos personales sensibles, como datos de salud o información genética, solicitaremos su consentimiento de manera clara e informada.

**Ejecución de un contrato:** Cuando el tratamiento sea necesario para la ejecución de un contrato en el que usted es parte, como en el caso de la relación laboral.

**Cumplimiento de una obligación legal:** Cuando el tratamiento sea necesario para cumplir con una obligación legal a la que estamos sujetos, como en el caso de la información fiscal.

**Interés legítimo:** En algunos casos, podemos tratar sus datos personales basándonos en nuestro interés legítimo, siempre y cuando este no prevalezca sobre sus derechos y libertades. En estos casos, le informaremos claramente sobre cuál es nuestro interés legítimo y cómo hemos equilibrado este interés con sus derechos.

Usted tiene derecho a oponerse al tratamiento de sus datos personales para finalidades no esenciales, como publicidad. Para ejercer este derecho, puede enviar un correo electrónico a [datospersonalescgmexico@contourglobal.com](mailto:datospersonalescgmexico@contourglobal.com); manifestando su negativa a dichas finalidades.

## **TRANSFERENCIA DE DATOS PERSONALES**

Le informamos que en caso de así requerirse para las finalidades antes mencionadas sus Datos Personales pueden ser compartidos y transferidos dentro y fuera del país por personas distintas a ContourGlobal México que usted otorga su consentimiento, si usted no manifiesta por escrito su oposición para que sus Datos Personales no sean transferidos.

Los terceros mencionados anteriormente pueden estar ubicados en México, en países de la Unión Europea o en cualquier otra parte del mundo. Cuando tus Datos Personales sean resguardados fuera de México o de la Unión Europea, nos aseguraremos que los mismos tengan un nivel adecuado de protección. Exigimos a nuestros proveedores de servicios o productos y consultores profesionales que establezcan y mantengan medidas de seguridad apropiadas para mantener la seguridad y confidencialidad de tus Datos Personales, mediante estrictos estándares y acuerdos legales. En caso de que la transmisión de los Datos se realice desde un país ubicado en la Unión Europea a un receptor en un país que tenga un régimen distinto en materia de protección de datos personales, nos aseguraremos que esta transmisión internacional de datos no afecte de una forma negativa el nivel de protección de tus Datos Personales, y se encuentre basada en medidas apropiadas de seguridad, tales como cláusulas estándar o reglas corporativas vinculantes. Puedes solicitar información sobre las medidas de seguridad que utilizamos a través del correo electrónico [datospersonalescgmexico@contourglobal.com](mailto:datospersonalescgmexico@contourglobal.com).

### **Finalidad de la Transferencia:**

- I. Para la prestación de servicios necesarios para la operación de ContourGlobal México; y
- II. Para el cumplimiento de obligaciones legales.

### **Garantías de Protección:**

Implementamos medidas de seguridad para proteger sus datos durante la transferencia, incluyendo el uso de Cláusulas Contractuales Estándar (CCS) para transferencias internacionales de datos.

## **CONSERVACIÓN DE DATOS PERSONALES**

Conservaremos tus Datos Personales por el tiempo que nos sea legalmente permitido, mientras sean necesarios para dar cumplimiento a alguna de las finalidades establecidas en el presente Aviso o a algún requerimiento u obligación legal que nos sea aplicable, o bien, mientras sea permitido en atención a cualquier plazo de prescripción legal. Tomaremos las medidas necesarias para destruir o disociar los Datos Personales que estén en nuestra posesión cuando ya no sean necesarios para cumplir con las finalidades previstas anteriormente o una vez concluidos los plazos de retención.

Contamos con una política de retención de datos que detalla los criterios para determinar el período de retención y los procedimientos para destruir o anónimizar los datos.

## **DATOS DE TERCERO RELACIONADO**

Con motivo de dar cumplimiento a las finalidades señaladas anteriormente, ContourGlobal México realice el Tratamiento de los Datos Personales de terceros relacionados contigo (tales como pareja o cónyuge, hijos,

dependientes y/o referencias personales; cada uno de ellos un “Tercero Relacionado”), tienes la obligación de compartir el contenido del presente Aviso de Privacidad con dicho Tercero Relacionado y de obtener su consentimiento para que ContourGlobal México pueda realizar el Tratamiento y hacer uso (incluyendo transmisión y revelación) de sus Datos Personales, de acuerdo a las finalidades previstas en el presente Aviso. En caso de que nos proporciones Datos Personales de un Tercero Relacionado, implica que tienes su consentimiento y has puesto a su disposición el presente Aviso de Privacidad en términos de lo señalado anteriormente, por lo que es tu obligación sacar en paz y a salvo a ContourGlobal México de toda responsabilidad que derive de cualquier queja o reclamación que llegase a imponer dicho Tercero Relacionado en nuestra contra.

Proporcionamos información clara y accesible sobre cómo se recopilan, utilizan y protegen los datos de terceros relacionados.

#### **DERECHOS ARCO**

En cumplimiento con la Ley, ContourGlobal México ha designado al Comité de Datos Personales (en lo sucesivo el Comité) como encargado de dar trámite a las solicitudes que usted pueda tener, incluyendo las solicitudes de acceso, rectificación, cancelación y oposición respecto al tratamiento de sus Datos Personales, así como para la revocación del tratamiento de los mismos. Para tal efecto usted deberá enviar su solicitud al Comité, misma que deberá de contener como mínimo lo siguiente:

- i. Nombre de Titular y Domicilio u otro medio para comunicar la respuesta a su solicitud;
- ii. Los documentos que acrediten la identidad ó en su caso la representación legal del titular;
- iii. La descripción clara y precisa de los Datos Personales de los que se busca ejercer alguno de los derechos antes mencionados; y
- iv. Cualquier otro elemento ó documento que facilite la localización de los Datos Personales.

Para cualquiera de las solicitudes antes mencionadas o en caso de cualquier duda o comentario respecto a sus Datos Personales puede comunicarse con el Comité a la dirección de correo electrónico [datospersonalescgmexico@contourglobal.com](mailto:datospersonalescgmexico@contourglobal.com).

Toma en cuenta que revocar o limitar tu consentimiento al Tratamiento de tus Datos Personales, puede llegar a afectar o limitar tu relación con ContourGlobal México.

#### **Plazos para Responder a Solicitudes:**

Informamos que los plazos para responder a las solicitudes de acceso, rectificación, cancelación y oposición son los establecidos en la LFPDPPP.

#### **OPCIONES Y MEDIOS PARA LIMITAR EL USO Y DIVULGACIÓN DE LOS DATOS**

Si usted desea dejar de recibir mensajes promocionales de nuestra parte por teléfono fijo, celular, correo postal, correo electrónico o cualquier otro medio, puede solicitarlo a través del Comité. Asimismo, le informamos que en nuestro sitio de internet se pudieran utilizar cookies y otras tecnologías las cuales pueden ser deshabilitadas mediante la función correspondiente en su navegador.

#### **USO DE TECNOLOGÍA “COOKIE” EN EL SITIO WEB**

Los sitios web de ContourGlobal México hacen uso de los archivos denominados “cookies”. Las “cookies” son pequeños archivos de texto que cada sitio web almacena localmente en tu equipo de cómputo o dispositivo electrónico. Una vez que nos hayas dado tu consentimiento para el uso de “cookies” o al ingresar

algún sitio web de ContourGlobal México, almacenaremos una “cookie” en tu dispositivo móvil para recordar esto para la próxima vez. Si deseas retirar tu consentimiento de la utilización de nuestras “cookies”, puedes hacerlo en el momento que lo deseas; podrás eliminar nuestras “cookies” modificando la configuración de tu navegador de Internet. Debes hacer esto modificando la configuración de cada navegador que utilices. Toma en cuenta que algunos de nuestros servicios no funcionarán si tu navegador no acepta “cookies”. Sin embargo, puedes permitir “cookies” de sitios web específicos marcándolos como “sitios web de confianza” en tu navegador de Internet.

**Política de Cookies:**

Obtenemos el consentimiento previo de los usuarios antes de instalar cookies no esenciales en sus dispositivos.

**MODIFICACIONES AL AVISO DE PRIVACIDAD**

Este aviso de privacidad podrá ser modificado en cualquier momento. Dichas modificaciones podrán ser consultadas por los diferentes medios y a través de nuestra página de internet [www.contourglobal.com](http://www.contourglobal.com).  
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