

## EXTERNAL PRIVACY POLICY

**Effective Date: 25 May 2018**

### Your Privacy

At Collaborative Solutions, we are committed to respecting your privacy. We recognize that when you choose to provide us with information about yourself in connection with our “Services,” you trust us to act in a responsible manner.

This External Privacy Policy (also known as a "Privacy Policy") applies to our activities and data subjects located within the European Union. It is intended to comply with our obligations to provide you with information about our processing of your Personal Information under privacy laws where we are acting as a 'controller'. It describes the categories of Personal Information we may process, how your Personal Information may be processed and how your privacy is safeguarded in the course of our relationship with you.

- The “**Services**” means any marketing functions provided (wholly or partially) by Collaborative Solutions, Inc., in connection with the provision of an online platform for Collaborative Solutions’ services and other services provided by Collaborative Solutions.
- “**Personal Information**” means any information describing or relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.
- “**GDPR**” means Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (Data Protection Directive)

### Who is responsible for your Personal Information?

Collaborative Solutions, LLC, with its registered seat at 11190 Sunrise Valley Drive, Suite 110, Campus at Sunrise, Reston, VA 20191, USA (“we”, “us”, “our” or “**Collaborative Solutions**”) will be the “controller” of your Personal Information. This means that we are responsible for deciding how your Personal Information is used, and for ensuring (in conjunction with other parties involved in the processing of your Personal Information, as explained in this Privacy Policy) that your Personal Information is handled in compliance with applicable data protection law. Please see How to contact us to find out how to contact us.

Our Data Protection Officer can be contacted at:

Ofer Benyona  
CIO  
Collaborative Solutions  
Obenyona@collaborativesolutions.com.

### What information does Collaborative Solutions collect?

In general, we collect Personal Information from you when you voluntarily provide it by: (1) providing information to us in furtherance of our business relationships; (2) registering on our website or otherwise contacting us to obtain information relating to our services; (3) signing up to enter a promotion,

participate in an event or survey, receive newsletters or other literature; or (4) providing information when we contact you either at trade events or by other means such as email or phone. In some cases we collect this information from you directly and we may also receive such information from our business partners (such as Hubspot, Workday, Tech Validate) who may collect this information from you in the context of your business relationship with us and/or the business partner.

In connection with these activities, we may collect various types of Personal Information that are necessary for the purposes described in this Privacy Notice, including:

- **Basic information** such as your first and last name, email address, telephone number, city, state and country of residence, occupation, company name, name of position within company, job title, job role, the organisation size, number of students of your educational entity and other information necessary to conduct business with you or which we, or our business partners may ask you to provide;
- **Technical information** such as your browser type (e.g., Netscape or Internet Explorer), operating system (e.g., Windows or Macintosh), Internet service provider, IP address, websites visited, the domain name from which you accessed the Services (e.g., yahoo.com), how you use and interact with our website, ERP and Financial platform used, use of Workday client , HR Solutions products used, Workday products modules used;;
- **Where you have provided your consent**, our Services may use standard technologies, such as “cookies,” web beacons and other HTML tools, to collect information about how you use the Services or to record that you opened an email marketing message. Collaborative Solutions may also use customized links or other similar technologies to track email links that you click. We may associate that information with your Personal Information in order to provide you more focused service communications. Please go to **What are “cookies” and web beacons?** below for more information.

### **Sensitive Personal Information**

Collaborative Solutions does not process any "Special Category Personal Data" (information relating to such matters as racial or ethnic origin, religious beliefs, physical or mental health (including details of accommodations or adjustments), certain maternity/adoption information, trade union membership, sexual orientation, information regarding sexual life, biometric data used to identify an individual, genetic data.

We may process Personal Information relating to criminal convictions and offences only where explicitly authorised by applicable laws, for example where we have a legal or regulatory requirement to report an offence or applicable laws authorise or require Collaborative Solutions to process information about the offence for the purpose of making decisions regarding your relationship with Collaborative Solutions, or to assess where a potential offence has occurred (for example, when we carry out anti-fraud checks on transactions).

### **How do we use this information?**

Collaborative Solutions may use this information for general business purposes, in accordance with applicable laws.

Where applicable data protection laws require us to process your Personal Information on the basis of a specific lawful justification, we generally process your Personal Information under one of the following bases:

- the processing is necessary in order for us to pursue our legitimate interests (being those purposes described below), except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of Personal Information;
- the processing is necessary for compliance with a legal obligation to which we are subject; or
- the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract.
- the processing is based on your explicit consent.

**Profiling of our customers**

Based on the information collected about you (including from cookies), we assign a set of "points" in our internal IT systems to each contact we have in our database. This is based on your activity on our website and our e-mail marketing communication with you. When a particular contact (e.g. your own) will reach a predetermined score, it will be assigned with one of our employees in order to follow-up with further actions, such as marketing offers and direct contact with you. We also use this data to manage workflows at our organisation and to improve our efficiency. The consequence of such profiling for you is that the more activity we record on our website from your device(s), the more likely you are to receive our marketing materials. We process your data based for the above purposes based on our legitimate interest.

We also use data obtained about you (including from cookies) to better understand your needs and provide you with better Services, personalize your experience on our Services, provide content of interest to you and understand how customers use our Services. Also, we co-operate with our business partners to compare our data on particular contact (e.g. you) to further tailor the user experience. The consequences of this types of profiling for you is that your user experience will be improved, and we will provide you with the content that should be of interest to you. We process your data based for the above purposes based on our legitimate interest.

You can at any time express your point of view regarding this process, request our intervention or object to such processing, by replying to our e-mails or contacting us at [inquiries@collaborativesolutions.com](mailto:inquiries@collaborativesolutions.com). The legal basis for such processing is described below.

**Purposes of processing**

We have identified the following purposes for processing Personal Information. These purposes each relate to a lawful basis for processing, as required under applicable law. These purposes include:

No.	Purpose for processing	Lawful basis
1.	To fulfil your requests for certain services.	<p>Where you personally have a contract with Collaborative Solutions to provide services, this processing is necessary to perform the contract between you and Collaborative Solutions.</p> <p>Where your company has a contract with Collaborative Solutions to provide services, this processing is necessary for the purpose of the legitimate interests pursued by Collaborative Solutions.</p>

No.	Purpose for processing	Lawful basis
2.	To conduct business with you.	<p>Where you personally are conducting business with Collaborative Solutions, this processing is necessary to perform the contract between you and Collaborative Solutions.</p> <p>Where your company is conducting business with Collaborative Solutions, this processing is necessary for the purpose of the legitimate interests pursued by Collaborative Solutions.</p>
3.	To correspond with you regarding orders, process a credit card order, or deliver a product.	<p>Where you personally are conducting business with Collaborative Solutions, this processing is necessary to perform the contract between you and Collaborative Solutions.</p> <p>Where your company is conducting business with Collaborative Solutions, this processing is necessary for the purpose of the legitimate interests pursued by Collaborative Solutions.</p>
4.	To keep you up to date on the latest product and services announcements and to provide you with other information we think you would like to hear about either from us or from our Collaborative Solutions business partners (although if you tell us that you do not wish to have this information used as a basis for further contact with you, we will respect your wishes),	<p>This processing is based on the legitimate interests pursued by Collaborative Solutions.</p> <p>However, where we are required by law to obtain your consent before sending you such information, we will rely upon such consent as our basis for processing.</p>
5.	To send you emails containing information about our services that we think may be of interest to you if you have indicated that you wish to receive such information by email.	<p>We consider that we have a legitimate interest in ensuring that our customers are kept up to date with information about our services, as this helps us to preserve our business operations or grow our business.</p> <p>However, where we are required by law to obtain your consent before sending you such information, we will rely upon such consent as our basis for processing.</p>

No.	Purpose for processing	Lawful basis
6.	To better understand your needs and provide you with better Services.	<p>This processing is necessary for the purpose of the legitimate interests pursued by Collaborative Solutions.</p> <p>We consider that we have a legitimate interest in ensuring that all customers receive the best possible experience, helping us to preserve our business operations or grow our business. Understanding our customers' needs is a vital part of ensuring a great customer experience.</p>
7.	To personalize your experience on our Services.	<p>This processing is necessary for the purpose of the legitimate interests pursued by Collaborative Solutions.</p> <p>We consider that we have a legitimate interest in ensuring that all customers receive the best possible experience, helping us to preserve our business operations or grow our business. Personalising our customers' experience helps us with this goal.</p>
8.	To conduct internal reviews of our Services and to help us better understand use of our Services,	<p>This processing is necessary for the purpose of the legitimate interests pursued by Collaborative Solutions.</p> <p>We consider that we have a legitimate interest in reviewing our Services, including how customers use our Services, in order to ensure that we are providing our customers with what they need, helping us to preserve our business operations or grow our business.</p>
9.	To help us improve the design and layout of our Services and provide content of interest to you.	<p>This processing is necessary for the purpose of the legitimate interests pursued by Collaborative Solutions.</p> <p>We consider that we have a legitimate interest in continually improving our services in order to preserve our business operations or grow our business and ensuring that you are provided with information of relevant to you.</p>

No.	Purpose for processing	Lawful basis
10.	To conduct internal Product reviews and to help us better understand how customers use our Services.	<p>This processing is necessary for the purpose of the legitimate interests pursued by Collaborative Solutions.</p> <p>We consider that we have a legitimate interest in reviewing our Services in order to continually improve our Service offering in order to preserve our business operations or grow our business and understanding how our customers use our Services is an important part of this.</p>
11.	To help us improve the Services.	<p>This processing is necessary for the purpose of the legitimate interests pursued by Collaborative Solutions.</p> <p>We consider that we have a legitimate interest in improving our Service offering in order to preserve our business operations or grow our business.</p>
12.	To help us adjust our marketing activities towards your needs by scoring contacts and managing workflows.	<p>This processing is necessary for the purpose of the legitimate interests pursued by Collaborative Solutions.</p> <p>We consider that we have a legitimate interest in sending our marketing content to clients who we assess to be interested in our offers and to manage our workflows accordingly, in order to preserve our business operations or grow our business.</p>
13.	To notify you in the event of an incident such as a data breach.	Collaborative Solutions in certain situations has a legal obligation to provide you with such information.

Additional information regarding specific processing of Personal Information may be notified to you. If you do not provide us with your Personal Information, we may be unable to provide you with some or all of the Services: we will tell you at the time of collection whether provision of Personal Information is mandatory, and the potential consequences of refusing to provide it.

**Who do we disclose this information to?**

We share your information with our business partners, service vendors, authorized third party agents and contractors, your organization’s account administrators, and Collaborative Solutions affiliates for the purposes mentioned above (such as Hubspot, Salesforce, Tech Validate). Other examples of third parties with whom your Personal Information may be shared include tax authorities, regulatory authorities, our insurers, IT administrators, lawyers, auditors, consultants and other professional advisers.

Collaborative Solutions requires such third parties to process any data disclosed to them in accordance with applicable law, including with respect to data confidentiality and security. Where these third parties act as a "data processor" (for example, our IT sub-contractors), they carry out their tasks on our behalf

and upon our instructions for the above-mentioned purposes. In this case your Personal Information will only be disclosed to these parties to the extent necessary to provide the required services.

Your data may also be transferred to third parties subject to confidentiality provisions in contemplation of or in connection with a reorganization, restructuring, merger, acquisition, transfer of assets or similar transaction.

In addition, we may, to the extent permitted by law, share personal data with legal, regulatory and national authorities in order to comply with a legal obligation to which we are subject. This is for example the case in the framework of imminent or pending legal proceedings or a statutory audit.

Collaborative Solutions will not trade, sell or rent your Personal Information although we may disclose your information in connection with a sale or disposal of all or part of the Collaborative Solutions business.

### **International Transfers**

Because Collaborative Solutions operates globally your information may be transferred to other countries for any of the purposes described above. In particular we may transfer some of your information to be held and processed on our behalf for the abovementioned purposes by third parties such as Hubspot, Salesforce and TechValidate, based in US, which do not provide for an adequate level of protection of Personal Information.

Where required by applicable data protection laws, we will ensure that appropriate or suitable safeguards are in place to protect your Personal Information, and that any transfer of your Personal Information is in compliance with applicable data protection laws. It is Collaborative Solutions policy that where a country outside of the EU is not subject to an adequacy decision under Article 45 of the GDPR, then standard data protection clauses under Article 46(2) of the GDPR will be put in place. We will ensure that the international transfer of your data will be compliant with all other applicable requirements set out in the GDPR.

You can obtain a copy of the relevant safeguard, where this is documented, by contacting [security@collaborativesolutions.com](mailto:security@collaborativesolutions.com).

### **How does Collaborative Solutions protect your information?**

We take steps in accordance with good industry practice and in compliance with Article 32 and 35 of the GDPR to protect the information we collect from unauthorized access, disclosure, alteration, or destruction. Collaborative Solutions safeguards the security of the data you send us with physical, electronic, and managerial procedures. Access to your Personal Information will be limited to those with a legitimate basis to use the data (in connection with one or more of the purposes previously identified) - i.e. on a 'need to know' basis and the relevant employees will be subject to confidentiality obligation.

### **Storage of your Personal Information**

We endeavour to ensure that Personal Information is kept as current as possible and that irrelevant or excessive data are deleted or made anonymous as soon as reasonably practicable. However, some Personal Information may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

We will retain your Personal Information only so long as it is required for purposes for which it was collected (e.g. for the period when you are actively engaged with us). This will usually be the period of your relationship with us plus the length of any applicable statutory limitation period following the end

of such relationship, although some data may need to be kept for longer. We may keep some specific types of data, for example, tax records, for different periods of time, as required by applicable law.

Upon lapse of the above retention periods, we will permanently delete your personal data.

### **What are “cookies” and web beacons?**

“Cookies” are small pieces of information that are stored by your browser on your computer’s hard drive which enables us to recognize your computer when you return to our Services. A cookie file can contain information such as a user ID that may be used to track the pages you have visited on our Services. Our cookies enable us to provide you with a more personal service.

A web beacon is an electronic image, called a single-pixel (1x1) or clear GIF. Web beacons can recognize certain types of information on a user’s computer, such as a user’s cookie number, time and date of a page view, and a description of the page where the web beacon is placed. Some Web beacons may be unusable if you elect to reject their associated cookies.

If you prefer not to receive cookies while browsing our Services or via HTML-formatted emails, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser, although you may not be able to take full advantage of our Services if you do so.

### **Your Rights**

#### ***Your right to Access, Update or Remove Your Information***

You have the right to request access to any of your Personal Information that Collaborative Solutions may hold, and to request correction of any inaccurate data relating to you. You furthermore have the right to request deletion of any irrelevant data we hold about you.

If you would like to access or change any of your Personal Information which we hold please email us at [security@collaborativesolutions.com](mailto:security@collaborativesolutions.com). You may also request the removal or correction of your Personal Information held by us by sending an email to the same address.

If you choose to remove your information, you should be aware that we may retain some Personal Information to the extent required to prevent fraud, resolve disputes, troubleshoot problems, enforce Collaborative Solutions’ Terms and Conditions, respect your opt-out preferences, and comply with legal requirements, if permitted by law.

#### ***Additional Rights***

***Data portability*** - where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing; and that personal data is processed by automatic means, you have the right to receive all such personal data which you have provided to Collaborative Solutions in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.

***Right to restriction of processing*** - you have the right to restrict our processing of your personal data where:

- you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;



- where the processing is unlawful but you oppose the erasure of the data;
- where we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
- where you have objected to processing justified on grounds relating to particular situation pending verification as to whether Collaborative Solutions has compelling legitimate grounds to continue processing.

Where personal data is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims.

***Right to withdraw consent*** - where we are relying on your consent to process data, you have the right to withdraw such consent at any time. You can do this by (i) in respect of email marketing relying on your consent, clicking the 'unsubscribe' link; or (ii) contacting [security@collaborativesolutions.com](mailto:security@collaborativesolutions.com).

***Right to object to processing justified on grounds relating to particular situation*** - where we are relying upon legitimate interest to process data (see "How do we use this information?" above), then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims.

#### ***Right to object to processing for direct marketing purposes***

If you object to processing of your personal data for direct marketing purposes of our products and services, we will no longer process your personal data for such purposes.

You also have the right to lodge a complaint with a supervisory authority, in particular in your country of residence, if you consider that the processing of your personal data infringes applicable law.

**For further information regarding your rights, or to exercise any of your rights, please contact [security@collaborativesolutions.com](mailto:security@collaborativesolutions.com).**

#### **Children and Privacy**

We do not knowingly collect, maintain, or use Personal Information from children under 16 years of age, and no part of the Services are directed to children under the age of 16. If you learn that your child has provided us with Personal Information without your consent, you may alert us at [security@collaborativesolutions.com](mailto:security@collaborativesolutions.com). If we learn that we have collected any Personal Information from children under 16, we will promptly take steps to delete such information and terminate the child's account.

#### **Additional Privacy Notices and Updates**

We may undertake certain processing of Personal Information which are subject to additional Privacy Notices (for example, in relation to specific Services) and we shall bring these to your attention where they engage.

Collaborative Solutions may update this Policy from time to time. Where we make any changes to our processing of Personal Information that may affect your interests, you will be informed of these changes or made aware that we have updated this Notice so that you know which information we process and how we use this information. The latest version is available at our website.

### **How to contact us**

Our goal is to respect your privacy. To help us improve our privacy policies, please give us your feedback.

Please contact us if you have any questions regarding this Policy or if you would like more information regarding any processing of personal data undertaken by Collaborative Solutions.

We welcome your comments and questions.

You can contact us by:

- sending a letter to Collaborative Solutions, LLC

11190 Sunrise Valley Dr., Ste 110, Reston, VA 20191

- Or by sending an email to [security@collaborativesolutions.com](mailto:security@collaborativesolutions.com)

This policy was last updated and reviewed on 26 November 2019.