

## Impartner Website Privacy Policy

Updated: November 3, 2022

Impartner respects your privacy. We have created this Privacy Policy to help you understand what personal information we collect, why we collect it, and how we use it. This Privacy Policy applies to websites owned and operated by Impartner, Inc. and its affiliates (“**Impartner**,” “**we**,” “**us**,” or “**our**”) that link to this Privacy Policy, including [www.impartner.com](http://www.impartner.com), (“**Website**”). This Privacy Policy also describes your rights regarding our use of your personal information

By using or otherwise visiting our Website, you agree and acknowledge that you have read and understood our data collection, use, and disclosure practices, and other activities as described in this Privacy Policy, and any additional privacy statements that may be posted on an applicable part of the Website.

- **California residents** please click [here](#) to learn more about your privacy rights.
- **European Economic Area and United Kingdom residents** please click [here](#) to learn more about your privacy rights.

### Personal Information Collected by Impartner

#### *Information You Provide Directly*

We and our Service Providers (defined below) may collect information you provide directly to us and/or our Service Providers via the Website. For example, we collect information when you use or register for the Website or events, request a quote or demos, post on the Website, or communicate or transact through the Website. In addition, when you interact with Third-Party Services (defined below), you may be able to provide information to those third parties. Information that We, our Service Providers and/or Third-Party Services may collect from you includes: your first and last name, institution/company, e-mail address, user name, Third-Party Services logins and other credentials, phone number, address, payment information and other information that personally identifies you (“personal information”).

#### *Information Collected Automatically*

We, our Service Providers, and/or Third-Party Services may also automatically collect certain information about you when you access or use the Website (“Usage Information”). Usage Information may include IP address, device identifier, browser type, operating system, information about your use of the Website, device you use, the web page you visited before coming to our sites, and identifiers associated with your devices and your devices (depending on their settings) may also transmit location information to the Website.

The methods that may be used on the Website to collect Usage Information include cookies, web beacons (also known as “tracking pixels”), embedded scripts, location-identifying technologies, device recognition technologies, in-app tracking methods, device and activity monitoring and other tracking technologies now and hereafter developed (“Tracking Technologies”) may be used to collect information about interactions with the Website or e-mails, including information about

your browsing and purchasing behavior. Such Tracking Technologies may include cookies, web beacons, embedded scripts, location-identifying technologies, device-recognition technologies, and device and activity monitoring.

Some information about your use of the Website and certain other online services or website may be collected using Tracking Technologies across time and websites and used by us and third parties for purposes such as to associate different devices you use and deliver relevant ads and/or other content to you on the Website and certain other online websites.

*Information We Collect From Other Sources.* We may also obtain information about you from other sources, including Service Providers, Third-Party Services and public sources. We are not responsible nor liable for the accuracy of the information provided by third parties or for third party policies or practices.

*Limitations.*

To the extent any non-personal information, or personal information collected outside of the Website or by Third-Party Services, is combined by or on behalf of us with personal information we collect directly from you on the Website (“Company-Collected Personal Information”), we will treat it in accordance with this Privacy Policy. Notwithstanding the foregoing or anything to the contrary, unless required by applicable law, this Privacy Policy is not intended to limit our activities regarding information that does not personally identify you such that it does not constitute personal information, including personal information that has been “De-identified” (i.e., the removal or modification of the personally identifiable elements, or the extraction of non-personally identifiable elements), and non-Company-Collected Personal Information (including third-party-sourced, or non-Website-sourced, information) that is not combined with Company-Collected Personal Information.

Notably, the definition of personal information and personal data under certain laws and regulations differs from the definition of personal information as used in the non-California-specific portions of this Privacy Policy.

Impartner collects personal information:

- that you provide directly to us through our Website, such as through quote or demo requests, support and assistance inquiries, mailing list or newsletter subscriptions, or event registration forms;
- automatically using cookies and other tracking technologies when you navigate our Website, as explained in more detail in our [Cookie Policy](#);
- from third parties providing this information to support our demographic research and for marketing purposes.

We also may collect information from any comments or reviews you post about us on third-party websites. When submitting information to a third party, you are subject to that third party’s terms of use and privacy policies. Impartner may combine information about you that we already have with information we obtain from third parties.

The personal information we collect directly, automatically, or from third parties includes:

- personal details, such as your name, email address, telephone number, and other contact information;
- professional or employment information, such as information provided on your resume and in your job application when you choose to submit an application for employment;
- Internet, network, and device information, such as IP address, browser type, operating system, device information, online identifiers, and other information about your interaction with our Website and communications;
- general location data; and
- other personal information you choose to provide to us, such as when you interact with our customer support or through our other communication channels.

If you wish to correct any of the personal information you have provided to us, you may do so by contacting us via our [Impartner Privacy Center](#). Please note that outdated copies of information that you have updated may remain viewable in cached and archived pages for a period of time, and we may maintain records in our systems of this information as well.

## **How We Use Your Personal Information**

We may use your personal information to:

- communicate with you, including to respond to your questions and requests, provide you with information you have requested, or offer user support;
- process your orders or purchases;
- market and advertise our products and services, including to send you news, updates, special offers and promotions, and targeted advertising;
- personalize our content, including to tailor the information we send or show you, and to offer personalization based on your past interactions with us;
- monitor and analyze trends, usage, and the activities of users of our Website to better understand how our users access and use our Website in order to improve them, respond to user preferences, and for other research purposes;
- improve our Website and notify you about important updates;
- perform business analyses or for other business purposes;
- identify, prevent, investigate, and take other actions with respect to suspected or actual fraud or illegal activity or other activity that violates our policies;
- ensure the security and integrity of our personal information processing;
- protect our rights, property, or safety and that of our users and our confidential and proprietary information;
- comply with applicable laws, rules, regulations, and legal processes as well as our company policies, including to respond to claims asserted against us and to enforce or administer terms and agreements; and

- fulfill any other purposes, including those with your consent (if required), not inconsistent with our statements under this Privacy Policy or otherwise made by us in writing at the point of collection, and not prohibited by law.

## **Personal Information Sharing and Disclosure**

Impartner may disclose your personal information to its vendors, agents, or contractors to perform services on our behalf. Our vendors, agents, and contractors are subject to data protection and confidentiality obligations when processing personal information on our behalf and may not use personal information for any other purpose.

Impartner also may share your personal information to:

- provide you with products or services you have requested;
- better respond to your inquiries;
- advertise or market our products and services;
- perform marketing research and for sales, support, and service-related purposes;
- protect rights, property, life, health, security, and safety;
- respond to legal process, including to disclose personal information to a court, legal authority, opposing party in litigation, our legal counsel, or other advisors in connection with a judicial proceeding, court order, subpoena, or other legal process;
- negotiate or complete any proposed or actual merger, purchase, sale, or any other type of acquisition or other transaction, including a transfer of all or a portion of our business to another organization;
- disclose personal information with your consent or at your direction; and
- achieve any other purpose consistent with our statements in this Privacy Policy, other statements made to you at the time of collection, or otherwise allowed by applicable law.

We may disclose your personal information to comply with applicable law, such as in response to requests from law enforcement agencies, regulators, other public authorities, courts, and third-party litigants in connection with legal proceedings or investigations.

## **Opting Out of Marketing Communications**

If you have requested information from us, we may send you e-mail communications with information about our products and services. We will include instructions in each marketing e-mail message explaining how to unsubscribe from our marketing e-mail communications if you do not want to receive these in the future. At any time, you can opt out of receiving marketing communications from Impartner by submitting a request via our [Impartner Privacy Center](#). Please note that if you opt-out of marketing communications you may still receive transactional and legal communications from us.

You may limit the use of your browsing activities and interests for interest-based advertising by clicking [here](#) (or if located in the European Union, click [here](#)). Note that opting out of interest-based advertising through these tools does not opt you out of being served ads. You will continue

to receive ads, but they are unlikely to be personalized to you. To learn more, please review our [cookie policy](#).

### **Third-Party Content, Third-Party Services, Advertising and Analytics**

The Website may include or link to Third-Party Services, apps, locations, platforms, code (e.g., plug-ins, application programming interfaces, and software development kits (“SDKs”)) or other Websites (collectively, “Third-Party Service(s)”). These Third-Party Services may use their own cookies, web beacons, and other Tracking Technologies to independently collect information about you and may solicit information from you.

Certain functionalities on the Website permit interactions that you initiate between the Website and certain Third-Party Services. Examples of such interactions include connecting the Website to a Third-Party Service (e.g., to pull or push information to or from the Services). If you enable such interactions, both we and the third party may have access to certain information about you and your use of the Website and any Third-Party Service.

We may engage and work with Service Providers, Third-Party Services, and other third parties to serve advertisements on the Website and/or on other online websites. Some of these ads may be tailored to your interest based on your browsing of the Website and elsewhere on the Internet, which may include use of precise location and/or cross-device data, sometimes referred to as “interest-based advertising” and “online behavioral advertising” (“Interest-based Advertising”), which may include sending you an ad on another online website after you have left the Website (i.e., “retargeting”).

We are not responsible for, and make no representations regarding, the policies or business practices of any third parties, including, without limitation, analytics Service Providers and Third-Party Services associated with the Website, and encourage you to familiarize yourself with and consult their privacy policies and terms of use. See the “Tracking Technologies Choices” section below for more on certain choices offered by some third parties regarding their data collection and use, including regarding Interest-based Advertising and analytics.]

### **Tracking Technologies Choices**

*Tracking Technologies Generally.* Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options, so you may need to set them separately. Also, tools from browsers may not be effective with regard to certain Tracking Technologies. Please be aware that if you disable or remove these technologies, some parts of the Website may not work and when you revisit the Website your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

Some App-related Tracking Technologies in connection with non-browser usage (e.g., most functionality of a mobile app) can only be disabled by uninstalling the app. To uninstall an app, follow the instructions from your operating system or handset manufacturer. Apple and Google mobile device settings have settings to limit ad tracking, and other tracking, but these may not be completely effective.

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online Websites you visit. Like many online services and websites, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” you can visit <http://www.allaboutdnt.com>, but we are not responsible for the completeness or accuracy of this third party information. For specific information on some of the choice options offered by third party analytics and advertising providers, see the next section.

*Analytics and Advertising Tracking Technologies.* You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on. You may exercise choices regarding the use of cookies from Adobe Analytics by going to <http://www.adobe.com/privacy/opt-out.html> under the section labeled “Tell our customers not to measure your use of their web sites or tailor their online ads for you.”

You may choose whether to receive some Interest-based Advertising by submitting opt-outs. Some of the advertisers and Service Providers that perform advertising-related Websites for us and third parties may participate in the Digital Advertising Alliance’s (“DAA”) Self-Regulatory Program for Online Behavioral Advertising. To learn more about how you can exercise certain choices regarding Interest-based Advertising, including use of Cross-device Data for serving ads, visit <http://www.aboutads.info/choices/>, and <http://www.aboutads.info/appchoices> for information on the DAA’s opt-out program specifically for mobile apps (including use of precise location for third party ads). Some of these companies may also be members of the Network Advertising Initiative (“NAI”). To learn more about the NAI and your opt-out options for their members, see <http://www.networkadvertising.org/choices/>. Please be aware that, even if you are able to opt out of certain kinds of Interest-based Advertising, you may continue to receive other types of ads. Opting out only means that those selected members should no longer deliver certain Interest-based Advertising to you but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). Also, if your browsers are configured to reject cookies when you visit these opt-out webpages, or you subsequently erase your cookies, use a different device or web browser or use a non-browser-based method of access (e.g., mobile app), your NAI / DAA browser-based opt-out may not, or may no longer, be effective. We support the ad industry’s [Self-regulatory Principles for Online Behavioral Advertising](#) and expects that ad networks we directly

engage to serve you Interest-based Advertising will do so as well, though we cannot guaranty their compliance.

We may also use Google Ad Websites. To learn more about the data Google collects and how your data is used by it and to opt out of certain Google browser Interest-Based Advertising, please visit [here](#).

## **Social Features**

Our Website may include features that allow you to interact with social media networks operated by unaffiliated parties, such as Facebook, LinkedIn, and Twitter. Data collection, use, and other processing is governed by the privacy policy of the social media platform.

If you choose to “like” or share content or post information using these features, that information may be publicly displayed, and the party operating the social media platform may receive information about you and your use of our Website. Similarly, if you interact with us through these features, we may have access to personal information about you from the social media platform. In addition, we may be able to track when you like us, follow us, or share our content through Facebook, Twitter, or other social media platforms.

Please note that if you mention Impartner, or comment about or in response to us, in your post on a social media platform, that platform may allow us to publish your post on our Website or public social media pages or otherwise use your post about us. You should review the terms, policies, and settings of these platforms to learn more about their data practices and adjust your own settings accordingly.

## **Impartner Blog**

Our Website may offer a publicly accessible blog. Any personal information you provide in this area will be treated as non-confidential and will not be subject to this privacy policy. In addition, it may be visible to, searchable by, and read and used by others. Please note that we may not be able to prevent personal information you make available on our blog from being used in a manner that violates this Privacy Policy, the law, or your personal privacy. For instance, your personal information may have been archived by search engines and others that we cannot control. To request removal of your personal information from our blog, contact us at [dataprivacyteam@impartner.com](mailto:dataprivacyteam@impartner.com).

## **Children’s Privacy**

Our Website is not intended for or directed to children, and we do not knowingly collect personal information from children. If we become aware that we have collected the personal information of a child (i.e., under 13 in the U.S. and under 16 in the EU and UK), we will delete all such data in accordance with applicable law.

## **Security of Your Personal Information**

We maintain a comprehensive information security program that contains appropriate administrative, technical, and physical measures designed to ensure a level of security appropriate to the nature of our business and the personal information we collect and process. Of course, there is no such thing as perfect security on the Internet. You are responsible for maintaining the secrecy of your passwords or any account information. Please be careful and responsible whenever you're online. If you have any questions about the security of your personal information, you can contact Us at the contact information below.

### **Personal Information Retention**

We retain your personal information for no longer than is necessary to achieve the purposes for which the personal information was collected, or as may otherwise be permitted or required under applicable law.

### **NOTICE TO CALIFORNIA RESIDENTS**

As a supplement to other information provided throughout this Privacy Policy, we provide the following additional information as a notice to residents of California (“**California consumers**”) in accordance with the California Consumer Privacy Act (“**CCPA**”).

**Our Collection and Disclosure of California Consumers’ Personal Information.** In the previous twelve (12) months, Impartner has collected the following categories of personal information (also referred to as “PI”) about California consumers:

<b>CATEGORY</b>	<b>EXAMPLES OF PERSONAL INFORMATION COLLECTED</b>
Identifiers	Name, online identifier, IP address, email address, account name, or other similar identifiers
Customer records information described in Cal. Civ. Code § 1798.80(e)	Name, address, telephone number, employment history, credit or debit card number, other financial information
Commercial information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
Internet or other electronic network activity information	Browsing history, search history, and information regarding your interaction with a website, application, or advertisement
Professional or employment-related information	Professional or employment-related information

As explained in the **Personal Information Collected by Impartner** section above, we collect personal information from California consumers, their devices, Service Providers, and Third-Party Services (including third-party marketing vendors).



Within the past 12 months, we have collected, used, and shared the categories of personal information described in the chart above for the purposes described above in our Privacy Policy and also for the following CCPA-defined business purposes (collectively, our “Business Purposes”):

- providing our products and services, including maintaining and servicing accounts, processing purchases and payments, verifying information, and responding to inquiries;
- marketing, analytics, and similar functions and services used to communicate with you about our products and services;
- detecting security incidents and protecting against malicious, deceptive, or illegal activity;
- troubleshooting our Services to identify and repair issues;
- internal research and development, including the improvement of our Website;
- quality and safety assurance, and improving, upgrading, and enhancing our products and services; and
- processing and managing interactions and transactions for our products and services.

The categories of third parties to which we disclosed this personal information for Business Purposes include affiliated and related companies, Service Providers, professional advisors, public authorities/government bodies, and external auditors. More information on how we share personal information can be found in the **Personal Information Sharing and Disclosure** Section above.

As discussed in detail further below, we do not believe that we have “Sold” your PI as that term is defined in the CCPA. As described in our Privacy Policy above, cookie operator Third-Party Services (“Cookie Operators”) collect PI that falls under the Identifiers (e.g., cookie ID, IP address, and other online IDs) and Internet Usage Information categories. To the extent we have Sold PI, which we do not believe we have, the categories of PI would be Identifiers and Internet Usage information, and the recipients of each category of PI would be Cookie Operators. Please see the “Your Do Not Sell Rights” section below for information on how to exercise choice with respect to PI collected by Cookie Operators.

#### **Your “Do Not Sell” Rights.**

You have the right to opt-out of the sale of PI under the CCPA, by submitting a request via our [Impartner Privacy Center](#). We do not believe that we “Sell” your PI as such is defined under the CCPA. However, we will treat PI collected by Cookie Operators as subject to a Do Not Sell request and provide the ability for you to exercise choice (i.e., turn on and off) with respect to Tracking Technologies operated by Cookie Operators by following the instructions provided below under Tracking Technologies – Your Additional Choices. Please see further information below on how to exercise choice with respect to Tracking Technologies.

We may disclose your PI for the following purposes, which are not a Sale: (i) if you direct us to share your PI; (ii) to comply with your requests under the CCPA; (iii) disclosures amongst the entities that constitute Impartner as defined above, to Company’s Service Providers, or as part of a merger or asset sale; and (iv) as otherwise required or permitted by applicable law.

## Tracking Technologies – Your Additional Choices

*Browser Settings:* You can exercise control over browser-based cookies by adjusting the settings on your browser, and mobile devices may offer ad and data limitation choices. Please note that when you use cookie control tools, you will have to change your settings for each browser and device you use, and your limitation on cookies can limit the functionality of online services you use, including our services. Use the help function on your browser or click on the applicable links below to learn more:

- Google Chrome
- Firefox
- Internet Explorer
- Edge
- Safari

*Mobile Device Settings:* You can use mobile device settings to limit mobile tracking technologies and associated activities. For instance, you can adjust or reset the advertising identifiers on your mobile device in the device settings. iOS users can visit Settings > Privacy > Advertising > Reset Advertising Identifier. Android users can visit Google settings > Ads > Reset advertising ID. These controls work much like deleting cookies in a browser—the device is harder to associate with past activity, but tracking may still occur using the new advertising identifier. In addition, third party tools may enable you to search for and opt-out of some of these trackers, such as the Ghostery browser plug-in available at <https://www.ghostery.com/>.

*Ad Industry Tools:* Some third parties that may collect PI in association with your use of our online services for advertising, analytics, and other purposes, and may Sell that PI downstream, provide you the opportunity to opt-out of their Sales. Please visit <https://www.privacyrights.info/> to opt-out of the Sale of PI by participating third parties. You must opt out on every device and browser you use in order to effectuate your “Do Not Sell” requests from these parties. However, opting out does not mean you will stop seeing ads and you may continue to still see interest-based ads. To learn more about interest-based advertising and additional opt-out choices related to it, please visit <https://optout.aboutads.info/?c=2&lang=EN> and <https://optout.networkadvertising.org/?c=1>.

For more information, please see the “Tracking Technologies Choices” section above.

Please note, clearing cookies or changing settings may affect your choices and you have to opt-out separately via each browser and other device you use. Cookie-enabled opt-out signals may no longer be effective if you delete, block or clear cookies. We are not responsible for the completeness, accuracy or effectiveness of any third-party notices, tools, or choices.

Some browsers have signals that may be characterized as do not track signals, but we do not understand them to operate in that manner or to indicate a “Do Not Sell” expression by you, so we currently do not recognize these as do not Sell requests. We understand that various parties are developing “Do Not Sell” signals. Since we do not believe that we currently Sell PI, we do not currently look for such signals.

We do not knowingly sell the personal information of California consumers under 16 years of age.

**Your Right to Know.** You have the right to know:

- the categories of personal information we have collected about you;
- the categories of sources from which the personal information was collected;
- our business or commercial purposes for collecting (or selling, if applicable) your personal information;
- the categories of third parties with which we shared your personal information;
- the categories of personal information about you that we sold in the preceding 12 months and, for each category identified, the categories of third parties to which we sold that particular category of personal information; and
- the categories of personal information that we disclosed for a business purpose in the preceding 12 months and, for each category identified, the categories of third parties to which we disclosed that particular category of personal information.

**Your Deletion Rights.** You have the right to request that we delete personal information that we collect or maintain. In response, we will delete, and instruct any applicable service providers to delete, your personal information from our records, unless an exception applies, which we will explain in relation to any deletion request that you make.

**Your Non-Discrimination Rights.** You have the right not to be discriminated against for exercising any of your CCPA rights.

**How to Submit a Privacy Rights Request.** You can submit your request via our <[Impartner Trust Center](#)>, by contacting us at [dataprivacyteam@impartner.com](mailto:dataprivacyteam@impartner.com), or via phone at 801-501-7000. Only you, or someone you authorize to act on your behalf, may make a request related to your personal information. An authorized agent is either a natural person or a business entity registered with the California Secretary of State that a consumer has authorized to act on their behalf.

To verify your identity – i.e., to make sure you are who you say you are, or you are authorized to act on behalf of someone else as their agent – we may ask that you to provide us with, at a minimum, your full name and email, and the nature in which you have transacted or interacted with us. Depending on the nature of the request and whether we have the email address you have provided in our systems, we may request further information from you in order to verify that you are the California consumer about whom we have collected information. Please follow any instructions provided and promptly respond to any follow-up inquiries so that we may confirm your identity.

We will attempt to respond to California consumer requests in as timely a fashion as possible. In the event that we are unable to fulfill your request within 45 days, we will inform you of the reason and extension period in writing, but in no event greater than 90 days. Any disclosures we provide will only cover the 12-month period preceding the verifiable receipt of a California consumer request. The response we provide will explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before fulfilling your request.

Some personal information we maintain about California consumers is not sufficiently associated with a Consumer for us to be able to verify that it is a particular California consumer's personal information (e.g., clickstream data tied only to a pseudonymous browser ID). As required by the CCPA, we do not include that personal information in response to Verifiable Consumer Requests. If we cannot comply with a request, we will explain the reasons in our response.

**California's Shine the Light Law.** California residents may ask Impartner to provide them with (i) a list of certain categories of personal information that we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and (ii) the identity of those third parties. California residents may make one such request per calendar year. To make this request, you may contact us using the email or postal address in our contact information at the end of this Privacy Policy. In your request, please state that you are a California resident making a request under California's Shine the Light Law and provide a current California mailing address for our response.

*Please note that rights under the CCPA and California's Shine the Light law must be exercised separately.*

### **International Personal Information Transfers**

Impartner operates its Website from the United States. However, our Website may be accessed by users outside the United States. As a result, personal information may be transferred to and from the countries where Impartner's customers and its customers' partners operate. If you are using our Website outside the United States, please be aware that personal information we obtain about you may be transferred to and processed in the United States or other jurisdictions outside your own. By using our Website and providing your personal information, you acknowledge that your personal information may be transferred to and processed in jurisdictions other than your own. Please be aware that the data protection laws and regulations that may apply to your personal information in the United States or other countries may be different from the laws in your country of residence.

In accordance with applicable legal requirements, we take appropriate measures to facilitate adequate protection for any personal information transferred. When Impartner transfers, or receives the transfer of, personal information to the United States or other jurisdictions not deemed "adequate", Impartner does so under appropriate cross-border personal information transfer mechanisms, such as the EU's Standard Contractual Clauses (which may be supplemented by the UK Addendum) or the United Kingdom's International Data Transfer Agreement. You may obtain additional information about our data transfer mechanisms by contacting us at [dataprivacyteam@impartner.com](mailto:dataprivacyteam@impartner.com).

### **NOTICE TO EUROPEAN ECONOMIC AREA AND UNITED KINGDOM RESIDENTS**

As a supplement to the information provided throughout this Privacy Policy, we provide the following information as a notice to residents of the European Economic Area (“**EEA**”) of their rights under the European Union’s General Data Protection Regulation and residents of the United Kingdom of their rights under the United Kingdom’s General Data Protection Regulation.

Impartner, Inc. is the data controller for personal information collected through our Website. Impartner will only process your personal information where it has a lawful basis, as further described below.

**Legal Bases for Our Personal Information Processing.** Your personal information may be processed under one or more of the following legal bases:

- The processing is **necessary for us to enter into a contract** with you or to **take steps to enter into a contract** with you at your request. In such circumstances, if you fail to provide the information that we request, then we may be unable to enter into a contract with you or to perform our contractual obligations to you
- We have a **legal obligation** to process your personal information, such as compliance with applicable laws or other government regulations or compliance with a court order or binding law enforcement request.
- We or a third party has a **legitimate interest** in processing your personal information in circumstances where the interests pursued are not outweighed by any identified risks to your privacy. In particular, we have a legitimate interest in the following instances:
  - To analyze and improve the safety and security of our Website and Services, including by implementing and enhancing security measures and safeguards and protecting against fraud, spam, and other abuses;
  - To maintain and improve our Website, Services, and other products;
  - To operate and promote our products and services, to advertise and provide you with information and communications about our products and services that are tailored to, and in accordance with, your preferences; and
  - To protect our legal rights, prevent misuse of our Website or Services, perform or enter into a contract, or comply with any other legal obligations.
- You have **consented to** our processing of your personal information. When you consent, you may change your mind and withdraw your consent at any time by contacting us using the information provided at the end of this Privacy Policy. However, please note that any revocation of consent will not affect the lawfulness of our use of your personal information prior to revocation.

**Your Privacy Rights.** You have certain rights under data protection law in relation to your data which are listed below, although please note that not all of these apply in all circumstances:

- **Right of access** – subject to certain exceptions, you have the right of access to your personal data that we hold.

- **Right to rectify your personal information** – if you discover that the information we hold about you is inaccurate or incomplete, you have the right to have this information rectified (i.e. corrected).
- **Right to be forgotten** – you may ask us to delete information we hold about you in certain circumstances. This right is not absolute and it may not be possible for us to delete the information we hold about you, for example, if we have an ongoing contractual relationship or are required to retain information to comply with our legal obligations.
- **Right to restriction of processing** – in some cases you may have the right to have the processing of your personal information restricted. For example, where you contest the accuracy of your personal information, its use may be restricted until the accuracy is verified.
- **Right to object to processing** – you may object to the processing of your personal information (including profiling) when it is based upon our legitimate interests. You may also object to the processing of your personal information for the purposes of direct marketing and for the purposes of statistical analysis.
- **Right to data portability** – you have the right to receive, move, copy or transfer your personal information to another controller when we are processing your personal information based on consent or on a contract and the processing is carried out by automated means.

We may require specific information from you to help us verify your identity prior to processing your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why.

**Submitting a Complaint.** If you would like to submit a complaint about our use of your personal information or our response to your request regarding your personal information, you may contact us at [dataprivacyteam@impartner.com](mailto:dataprivacyteam@impartner.com) or submit a complaint directly to the data protection authority in your jurisdiction. If you reside in the EEA, you can find information about your data protection authority [here](#). If you reside in the United Kingdom, you may file complaints with the Information Commissioner’s Office [here](#).

## Privacy Shield Statement

Impartner recognizes that the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield Frameworks (collectively, “**Privacy Shield**”) are no longer valid transfer mechanisms for personal information from the EEA, Switzerland, or the United Kingdom. The U.S. Department of Commerce, which oversees compliance with Privacy Shield, has stated that it will continue to administer the Privacy Shield program. Accordingly, Impartner continues to comply and voluntarily maintains its Privacy Shield certification. To learn more about the Privacy Shield, visit the [U.S. Department of Commerce’s Privacy Shield website](#).

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the [Privacy Shield website](#), you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

## **Changes to this Privacy Policy**

Impartner may update this Privacy Policy at any time in order to account for changes to our processing activities or to reflect differing legal requirements. To the extent we make any substantive changes to this Privacy Policy then we will publish an updated version here and post prior versions on an archived privacy policies page. You can access the most current version of this Privacy Policy at any time on this site. The date of the most recent update appears at the top of this page. You may view Impartner's prior Privacy Policy <here>.

## **Contacting Impartner**

For questions or comments regarding this Privacy Policy or to exercise any of the rights explained in this Privacy Policy, please contact us via email at [dataprivacyteam@impartner.com](mailto:dataprivacyteam@impartner.com) or via phone at 801-501-7000.

Impartner, Inc.  
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South Jordan, UT 84095  
United States

[Prior Privacy Policies](#)