



## Loopio UK Ltd. Privacy Policy

**Last Updated: October 2023**

Loopio UK Ltd. (previously Avnio Ltd.), together with all other subsidiaries and related entities (collectively “**Loopio UK**”, “**we**”, “**our**”, or “**us**”, as applicable) respects your privacy and is committed to protecting the Personal Data (as defined below) you entrust us with. We provide a software as a service (“**SaaS**”) platform that is an RFX Solution and related professional services (collectively the “**Services**”). During the provision of the Services, we become stewards for the protection of the information that Users entrust with us.

This Privacy Policy should be read together with any other privacy notice or fair processing notice we may provide when we are collecting or processing Personal Data about you. To the extent applicable, this Privacy Policy will supplement, not override, any other notice that is provided to you.

### SCOPE

This Privacy Policy (this “**Policy**”) is intended to help you understand how we collect, use, store, share and protect Personal Data from prospects, customers, suppliers, business partners, website visitors, candidates and other individuals (collectively a “**User**”, “**you**”, or “**your**”, as applicable) to manage our relationship with you and fulfill our obligations to you through the use of the Services (as defined below) and/or your interactions with us. This Policy also explains your individual privacy rights and protections under applicable privacy legislation.

For the purposes of this Policy, “**Personal Data**” is defined as any information relating to an identified or identifiable natural person, as may be defined, or limited under applicable privacy legislation.

By using or accessing our Services, our websites (including downloading content), registering for an event we are hosting, applying for a job with us or otherwise generally interacting/communicating with us, you acknowledge that we will collect, use and share your Personal Data as described in this Policy. If you do not agree to any of the provisions set out in this Policy, then you should not provide your Personal Data to us.

Our use of your Personal Data is treated in accordance with and in compliance with applicable privacy laws, including the General Data Protection Regulation (EU) 2016/679, the UK Data Protection Act, the Information Technology Act, 2000 (read with Information (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011) and the California Consumer Privacy Act of 2018 (“**CCPA**”).

### WHAT WE COLLECT

In order to provide you with the Services, provide you access to our websites and to carry out other contractual obligations to you, we may be required to collect, use, store, and transfer the following categories of Personal Data about you:

- **General Contact Information:** First name, last name, username (or similar identifier), business billing address, business email address and telephone number.
- **Non-Personal Usage Information:** Information about how you use our website and Services, including your URL, clickstream information to, through, and from our website (including date and time), products viewed or searched for, page response times, download errors, length of visits to certain pages, and page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from the page.
- **Technical Information:** Cookies, full/partial Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, or operating system and platform.



- **Marketing and Communications Information:** Your preferences in receiving marketing and communications from us and our third parties.
- **Recruitment Information:** Information contained in your resume/CV, cover letter, or similar employment-related materials, including employment history, work experience, education background, and any social media handles or information available about you on social media if you connect with us through such media forms.
- **Financial Information:** Bank account, credit card, debit card or other payment instrument details provided to use for payment in respect of the Services.
- **Other Information:** Passwords created for using our Services, and other information related to password recovery.

## OUR ROLE

Through Loopio UK's provision of the Services to you, you are the **"Data Controller"** (who controls the Personal Data when using the Services) and Loopio UK is the **"Data Processor"** (who processes Personal Data on your behalf to provide you with the Services). To the extent that you upload Personal Data (either on your behalf of someone else's) you are responsible for ensuring that your use of the Services and provision of such Personal Data is in compliance with all applicable privacy laws and that you have provided all necessary notice, obtained all necessary consents, and otherwise have all authority to provide such Personal Data to us for the provision of our Services to you. You agree to not provide us with any sensitive Personal Data (as defined by applicable privacy laws).

To the extent the CCPA applies to you, you shall be deemed the **"business"** and Loopio UK will be deemed the **"service provider."**

If you are applying for a job or otherwise interacting with Loopio UK beyond the use of the Services (i.e., accessing our website), you will be deemed the **"Data Controller"** and Loopio UK will be deemed the **"Data Processor."**

## HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect your Personal Data, such as directly from you when you access our website, subscribe to our Services, apply for a job with us or otherwise interact with us.

We may also collect Personal Data from you *indirectly* when you interact with our website by using cookies, server logs and other similar technologies. This may include Technical Information about your equipment, browsing actions and patterns from (i) third-party analytics providers (such as Google based outside the EU) and (ii) search information providers (such as Google based outside the EU). We may also collect Contact Information from publicly available sources (such as Companies House).

## HOW WE USE PERSONAL DATA

We use your Personal Data to provide you with our Services, communicate with you, deliver advertising and marketing, consider you for employment with us or to conduct other business operations, such as improving and personalizing your experience on our websites.

Specific examples of how we may use your Personal Data, include:

- Provide you with the information, products, Services, and support that you request from us
- Comply with our contractual obligations to you, and to enforce our legal rights pursuant to our contracts with you, including for billing or collection purposes



- Ensure that we present our website content in the most effective manner to you and for your equipment
- Administer our website and conduct internal operations, including for troubleshooting, data analysis, testing, research, statistical, and survey purposes
- Improve your experience with our website, products or Services
- Enable your participation in our website's interactive, social media, or other similar features
- Measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you
- For job candidates, consider and respond to your application and assess your suitability for current and future career opportunities
- For legal, safety, and security purposes; we may also use Personal Data to comply with law or for safety and security reasons, as follows:
  - We may use and share Personal Data as we believe necessary or appropriate to comply with laws that apply to us and to support our bank partners' compliance with applicable law, including anti-money laundering (AML) and sanctions screening rules.
  - We may use and share Personal Data to respond to lawful requests and legal processes, such as to respond to subpoenas or requests from government authorities.
  - We may disclose Personal Data to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (i) protect our or others' rights, privacy, safety or property (including by making and defending legal claims); (ii) audit our internal processes for compliance with legal and contractual requirements; (iii) enforce the terms and conditions that govern the Services; and (iv) prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.
- For other disclosed purposes that are disclosed to you at the time you provide Personal Data to us, or for purposes where we obtain your consent.

## PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA

Below is a description of the ways in which we use your Personal Data, and legal basis we rely on in doing so.

'Legitimate interest' refers to the interest in conducting and managing our business to enable us to provide you with the Services and a good and secure experience when working with us. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

<u>Purpose/Activity</u>	<u>Type of Personal Data</u>	<u>Lawful Basis for Processing</u>
To process and deliver Services to you including:	<ul style="list-style-type: none"><li>• Contact Information</li><li>• Financial Information</li></ul>	Performance of contract with you  Necessary for our legitimate interests



<ul style="list-style-type: none"> <li>• Manage payments, fees and charges</li> <li>• Collect and recover money owed to us</li> </ul>	<ul style="list-style-type: none"> <li>• Transaction Information</li> <li>• Usage Information</li> <li>• Marketing &amp; Communications Information</li> </ul>	<ul style="list-style-type: none"> <li>• To recover debts due to us</li> </ul>
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms or privacy policy</li> <li>• Asking you to leave a review or take a survey</li> </ul>	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Marketing &amp; Communications Information</li> </ul>	<p>Performance of a contract with you</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests</p> <ul style="list-style-type: none"> <li>• To keep our records updated and to study how customers use our services</li> </ul>
<p>To enable you to participate in a prize draw, competition or complete a survey</p>	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Usage Information</li> <li>• Marketing &amp; Communications Information</li> </ul>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests</p> <ul style="list-style-type: none"> <li>• To study how customers use our services, to develop them and grow our business</li> </ul>
<p>To administer and protect our business, our website and Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Technical Information</li> </ul>	<p>Necessary for our legitimate interests</p> <ul style="list-style-type: none"> <li>• For running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise</li> </ul> <p>Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Usage Information</li> <li>• Technical Information</li> </ul>	<p>Necessary for our legitimate interests</p> <ul style="list-style-type: none"> <li>• To study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy</li> </ul>



	<ul style="list-style-type: none"> <li>Marketing &amp; Communications Information</li> </ul>	
To use data analytics to improve our website, Services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>Technical Information</li> <li>Usage Information</li> </ul>	<p>Necessary for our legitimate interests</p> <ul style="list-style-type: none"> <li>To define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy</li> </ul>
To make suggestions and recommendations to you about other goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Technical Information</li> <li>Usage Information</li> </ul>	<p>Necessary for our legitimate interests</p> <ul style="list-style-type: none"> <li>To develop our products/services and grow our business</li> </ul>

## SHARING OF PERSONAL DATA

We will only share your Personal Data with third parties where required by law, or with our employees, contractors, designated agents, or third-party service providers who require it to assist us with administering our relationship with you, including providing Services to us or on our behalf. Third-party service providers include, but are not limited to, those who may host our website, store data, provide back-up services, provide customer support, process customer payments, provide data analytic services, conduct surveys or obtain your feedback. We will not publish any Personal Data without your specific consent and any third party to whom the Personal Data is shared, will not be permitted to disclose it further without our consent.

We may disclose your Personal Data to other third parties for the following purposes:

- To other members of the Loopio UK group for the purposes set out in this Policy, as necessary to perform our rights or obligations with this Policy and as part of our regular reporting activities to other members of our group of companies;
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your Personal Data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum Personal Data necessary for the specific purpose and circumstances;
- During emergency situations or where necessary to protect the safety of persons;
- If a business transfer or change in ownership occurs; and
- For additional purposes with your consent where such consent is required by law.

We require all of our third-party service providers, by written contract, to implement appropriate security measures to protect your Personal Data consistent with our policies and any data security obligations applicable to us as your



service provider. We do not permit our third-party service providers to use your Personal Data for their own purposes; we only permit them to use your Personal Data for specified purposes in accordance with our explicit instructions. Details about our trusted third-party service providers are available upon written request.

### **CHILDREN'S PERSONAL DATA**

Our Services, including our website, and web and mobile apps, are not directed at children. We do not knowingly collect Personal Data through the Services from children younger than the legally qualifiable age under applicable data privacy laws in different jurisdictions. If a parent or guardian becomes aware that their child younger than such indicated age prevalent in the appropriate jurisdiction has provided us with personally identifiable information without their consent, the parent should contact us at [privacy@loopio.com](mailto:privacy@loopio.com) so that we can make reasonable efforts to delete such information from our records.

### **MARKETING PREFERENCES**

We strive to provide you with choices regarding how we use your Personal Data, particularly around our marketing and advertising practices. If you have opted-in to receiving communication from us, we may use your Contact, Technical, and Usage Information to help us assess what you may want, or what may be of interest to you.

You will receive marketing communications from us if you have requested information from us, purchased goods or Services from us, or if you provided us with your Contact Information for another purpose (i.e. registration in a promotion).

### **OPTING OUT**

Where you have provided your consent to the collection, use, and transfer of your Personal Data, you may have the legal right to withdraw your consent. To withdraw your consent, if applicable, please contact us at [privacy@loopio.com](mailto:privacy@loopio.com).

### **COOKIES**

Information about users accessing our websites is often collected through the use of "cookies". Our use of cookies will be in accordance with our [Cookies Policy](#).

### **THIRD PARTY LINKS**

Our website and Services may include links to third-party websites, vendor offerings or other applications, plug-ins and/or applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or the collection/use/processing of Personal Data that you provide them.

### **DATA SECURITY**

We have implemented appropriate and reasonable physical, technical, and organizational security measures designed to secure your Personal Data against accidental loss and unauthorized access, use alteration, or disclosure. In addition we limit Personal Data access to only those employees, agents, contractors, and other third parties that have a legitimate business need for such access. They will only be permitted to process your Personal Data in accordance with our instructions, and they are subject to a duty of confidentiality.

We have procedures in place to address a Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



## CROSS-BORDER DATA TRANSFERS

Where legally permitted, we may be required to transfer your Personal Data to another jurisdiction in order to perform the Services or for other purposes set out in this Policy. We will take all steps reasonably necessary to ensure that your Personal Data is subject to appropriate safeguards, such as relying on a recognized legal adequacy mechanism, and that it is treated securely and in accordance with this Policy and applicable law.

Whenever we transfer your Personal Data out of the European Economic Area (EEA) or the United Kingdom (UK), we will ensure a similar degree of protection is afforded to it by ensuring we are only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data, and/or if applicable, where we use certain service providers, we may use specific contracts approved by the applicable Information Commissioner which give Personal Data the same protection it has in the EU. The measures that we use to protect Personal Data are subject to the legal requirements of the jurisdictions to which we transfer Personal Data, including lawful requirements to disclose information to law enforcement and government agencies in those countries.

## DATA RETENTION

We will only retain your Personal Data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we need to process your Personal Data (and whether we can achieve those purposes through other means), and any applicable legal requirements.

Under some circumstances we may anonymise your Personal Data ("**Anonymized Data**") so that it can no longer be associated with you, for a legitimate business purpose. We may use this information indefinitely. This Anonymized Data does not directly identify you and can not be used to identify any specific individual. We use this Anonymized Data to understand, develop, improve, and market our Services.

## YOUR LEGAL RIGHTS

It is important that the Personal Data you provide us is accurate, current, and complete. Please keep us informed of any changes to your Personal Data.

In certain circumstances, you have following rights as it pertains to the Personal Data that we hold about you:

- Request Access to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you.
- Request Correction of the your Personal Data. This enables you to have any incomplete or inaccurate data we hold about you corrected. Note, we may need to verify the accuracy of the new data you provide to us.
- Request Erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with applicable law. Note, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to Processing of your Personal Data. You may object to the processing of your Personal Data where you feel our processing impacts on your fundamental rights and freedoms. You also have the right to object





where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- Request Restriction of Processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is lawful but you do not want us to erase it; (c) where you need us to hold data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the Transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw Consent. You may withdraw your consent at any time where we are relying on consent to process your Personal Data; however, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or Services to you. We will advise you if this is the case at the time you withdraw your consent.

Applicable law may allow or require us to refuse to provide you with access to some or all of the Personal Data that we hold about you. If we cannot provide you with access to your Personal Data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

If you wish to exercise any of the rights set out above, please contact us at [privacy@loopio.com](mailto:privacy@loopio.com).

We try to respond to all legitimate requests as soon as we can. If your request is particularly complex or you have made a number of requests, we may require additional information. In this case, we will notify you and keep you informed.

#### **DATA PRIVACY OFFICER**

We have appointed Neetu Toor, Loopio's General Counsel, as our Data Privacy Officer ("DPO") to oversee compliance with this Policy and to address any questions you may have. If you have any questions about this Policy, how we handle your Personal Data, would like to exercise any of the rights you have regarding your Personal Data, please contact us at [privacy@loopio.com](mailto:privacy@loopio.com).

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, (for example, see [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.html](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html)), who can provide further information about your rights and our obligations in relation to your Personal Data, as well as deal with any complaints that you have about our processing of your Personal Data.

#### **CHANGES TO THIS POLICY**

We reserve the right to update this Policy at any time to reflect changes to our personal information practices. If we make material changes to the Policy, we will provide notification by updating the "Last Updated" date at the top of the Policy and posting the new Policy to our website or other Services. We may also notify you about updates through email (sent to the email address specified in your account) or use other reasonable means to alert you to changes. We strongly encourage you to refer to this Policy often for the latest information about our privacy practices.





## CONTACT US

If you have any questions or comments about this Policy, the way in which we handle your Personal Data, or to exercise your legal rights, please contact us at:

Loopio UK Ltd.

Address: 5 New Street Square, London, United Kingdom, EC4A 3TW

Email Address: [privacy@loopio.com](mailto:privacy@loopio.com)

We are also registered with the Information Commissioner's Office in the United Kingdom who is the UK Regulator for data protection issues. The Information Commissioner's Office is based at Wycliffe House, Water Lane, Wilmslow SK9 5AF. Loopio UK Ltd.'s Registration Reference Number is: ZB485138 and Company Registration Number: 12039041