

## Idea Design Privacy Statement, effective as of June 1, 2022

At Idea Design, trust is our #1 value. This Privacy Statement describes how Idea Design collects, uses, shares or otherwise processes information relating to individuals (“Personal Data”) and the rights associated with that processing.

A reference to “Idea Design,” “we,” “us” or the “Company” is a reference to Idea Design USA LLC and its relevant affiliates involved in the collection, use, sharing, or other processing of Personal Data.

### 1. Responsible Idea Design entity

Idea Design is responsible for the processing of your Personal Data as described in this Privacy Statement, unless specified otherwise, and act as the controller of such Personal Data.

This Privacy Statement does not apply to the extent we process Personal Data in the role of a processor or service provider on behalf of our customers, including where we offer to our customers various products and services through which our customers (or their affiliates): (i) sell or offer their own products and services; (ii) send electronic communications to others; or (iii) otherwise collect, use, share or process Personal Data via our products and services.

For detailed privacy information related to an Idea Design customer or a customer affiliate who uses Idea Design products and services as the controller, please contact our customer directly. We are not responsible for the privacy or data security practices of our customers, which may differ from those explained in this Privacy Statement. For more information, please also see Section 10.3 below.

### 2. Processing activities covered

This Privacy Statement applies to the processing of Personal Data collected by us when you:

- Visit our websites that display or link to this Privacy Statement;
- Visit our branded social media pages;
- Visit our offices;
- Receive communications from us or otherwise communicate with us, including but not limited to emails, phone calls, texts or faxes;
- Use our products and services where we act as a controller of your Personal Data;
- Register for, attend or take part in our events, webinars, programs, trainings, certifications or contests;
- Act as or work for a service provider or supplier to Idea Design, to the extent Idea Design acts as a controller with respect to your Personal Data;
- Are employed by a customer of our products and services where your information has been shared with us in our capacity as a controller (for example, during the contracting process);

Our websites and services may contain links to other websites, applications, platforms and services maintained by third parties. The information practices of these third parties, including the social media platforms that host our branded social media pages, are governed by their privacy statements, which you should review to better understand their privacy practices

In some circumstances, we also collect, or our partners provide us with, publicly available information which may contain Personal Data that you have published or that has been made available online. The way in which our partners collect this is detailed in their own privacy policies, available on their websites.

3. What Personal Data do we collect?

3.1 Personal Data we collect directly from you

The Personal Data we collect directly from you may include identifiers, professional or employment-related information, financial account information, commercial information, visual information, and internet activity information, among others. We may collect such information in the following situations:

Situations	Categories of Personal Data
If you express an interest in obtaining additional information about our services; request customer support; use our "Contact Us" or similar features; register to use our websites or to receive communications; sign up for an event, webinar or contest; participate in a program, training, certification or survey; use our products and services; download certain content; or are employed by a customer of our products and services where your information has been shared with us	Contact information, such as your name, job title, company name, address, phone number, email address, username and password, other information you have voluntarily chosen to share
If you make purchases via our websites or register for an event or webinar	Contact information, financial and billing information, such as billing name and address, credit card number or bank account information
If you attend an event	Attendee badge information which may include name, title, company name, address, country, phone number and email address, image and video  During the Covid-19 pandemic, this may also include health status, including your temperature, COVID-19-related symptoms, exposure to COVID-19 positive individuals, vaccination status, testing results, and recent travel history

If you register with us for a variety of purposes, including joining a community that we host or participating in a program, training or certification	Username, photo, video or other biographical information, such as your occupation, location, social media profiles or usernames, company name, areas of expertise and interests
If you interact with our websites or emails	Information about your device and your usage of our websites or emails (such as Internet Protocol (IP) addresses or other identifiers), which may qualify as Personal Data (please see Section 4 below) using cookies, web beacons, or similar technologies
If you communicate with us via a phone call	If you communicate with us via a phone call
If you visit our offices	Name, email address, phone number, company name, time and date of arrival, image or video  During the Covid-19 pandemic, this may also include health status, including your temperature, COVID-19-related symptoms, exposure to COVID-19 positive individuals, vaccination status, testing results, and recent travel history
If you voluntarily submit certain information to us, such as filling out a survey, responding to a questionnaire or participating in other forms of research	Information you have provided as part of that request, which may include Personal Data and special categories of Personal Data, to the extent you voluntarily choose to provide it
If you are a supplier or service provider to Idea Design (or work for a supplier or service provider)	Contact information, payment and billing information

If you provide us, our service providers or our affiliates with any Personal Data relating to other individuals, you represent that you have the authority to do so, and where required, have obtained the necessary consent, and acknowledge that it may be used in accordance with this Privacy Statement. If you believe that your Personal Data has been provided to us improperly, or want to exercise your rights relating to your Personal Data, please contact us by using the information in Section 13 below.

3.2 Personal Data we collect from other sources

We also collect information about you from other sources including partners from whom we collect or purchase Personal Data or who provide us with publicly available information which may contain Personal Data. We may combine this information with Personal Data provided by you.

Provision of the services:

- The Personal Data we collect to provide our products and services may include information you have made publicly available online (such as when using social media sites) or that is published by third parties and contains information about you (such as news articles). For a select number of services, we collect this Personal Data from partners who may receive this data when you visit or use their services or through the third parties they work with. We analyze this information to enable our customers to assess the success of their brands.
- In addition, the Personal Data we collect to provide our products and services may include location information from third parties, which helps us offer features like identity management and multi-factor authentication.

Advertising: The Personal Data we collect from other sources for the purposes of tailored advertising includes identifiers, professional or employment-related information, education information, commercial information, visual information, internet activity information, and inferences about preferences and behaviors. We, collect this from third party providers of business contact information, including mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), IP addresses, social media profiles, LinkedIn URLs and custom profiles for purposes of targeted advertising, delivering relevant email content, event promotion and profiling, determining eligibility and verifying contact information. This helps us update, expand, and analyze our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you.

Additional sources: In addition to the aforementioned, we collect Personal Data from the following sources:

- Another individual at your organization who may provide us with your personal information, which may include Personal Data and special categories of Personal Data, to the extent you consent to providing it and sharing it, for the purposes of obtaining services and assessing our goals related to encouraging diversity within our vendors

#### 4. What Usage Data do we process?

We use common information-gathering tools, such as tools for collecting data, cookies, web beacons, pixels, and similar technologies to collect information that may contain Personal Data as you navigate our websites, our services, or interact with emails we have sent to you.

##### 4.1 Device and Usage Data

As is true of most websites, we gather certain information when individual users visit our websites. This information may include (i) identifiers, such as user ID, organization ID, username, email address and user type; (ii) commercial information; and (iii) internet activity information such as IP address (or proxy server information), device and application information, identification numbers, location, browser type,

Internet service provider or mobile carrier, user interactions such as the pages and files viewed, website and webpage interactions including searches and other actions you take, operating system type and version, system configuration information, date and time stamps associated with your usage and details of which of our products and product versions you are using. This information is used for the purposes set out in section 5 of this Privacy Statement below.

In addition, we gather certain information automatically as part of your use of our products and services (“Usage Data”). This information may include identifiers, commercial information, and internet activity information such as IP address (or proxy server), mobile device number, device and application identification numbers, location, browser type, Internet service provider or mobile carrier, the pages and files viewed, website and webpage interactions including searches and other actions you take, operating system type and version, system configuration information, date and time stamps associated with your usage and details of which of our products and product versions you are using. This information is used for the purposes set out in detail in section 5 of this Privacy Statement below. In addition, we may use aggregate and de-identified Usage Data for other internal business purposes, such as to identify additional customer opportunities and to ensure that we are meeting the demands of our customers and their users. Please note that this Usage Data is primarily used to identify the uniqueness of each user logging on (as opposed to specific individuals), apart from where it is strictly required to identify an individual for security purposes or as required as part of our provision of the services to our customers.

#### 4.2 Cookies, web beacons and other tracking technologies on our website and in email communications

We use technologies such as web beacons, pixels, tags, and JavaScript, alone or in conjunction with cookies, to gather information about the use of our websites and how people interact with our emails.

When you visit our websites, we, or an authorized third party, may place a cookie on your device that collects information, including Personal Data, about your online activities over time and across different sites. Cookies allow us to track use, infer browsing preferences, and improve and customize your browsing experience.

We use both session-based and persistent cookies on our websites. Session-based cookies exist only during a single session and disappear from your device when you close your browser or turn off the device. Persistent cookies remain on your device after you close your browser or turn your device off. To change your cookie settings and preferences for one of our websites, click the Cookie Preferences link in the footer of the page. You can also control the use of cookies on your device, but choosing to disable cookies on your device may limit your ability to use some features on our websites and services.

We also use web beacons and pixels on our websites and in emails. For example, we may place a pixel in a marketing email that notifies us when you click on a link in the email. We use these technologies to operate and improve our websites and marketing emails. – please see more details in the “Advertising Cookies” row in the table below. For instructions on how to unsubscribe from our marketing emails, please see Section 10.4 below.

The following describes how we use different categories of cookies and similar technologies and your options for managing the data collection settings of these technologies:

Type of Cookies	Description	Managing Settings
Required cookies	<p>Required cookies are necessary for basic website functionality. Some examples include: session cookies needed to transmit the website, authentication cookies, and security cookies.</p> <p>If you have chosen to identify yourself to us, we may place on your browser a cookie that allows us to uniquely identify you when you are logged into the websites and to process your online transactions and requests.</p>	<p>Because required cookies are essential to operate the websites, there is no option to opt out of these cookies.</p>
Functional cookies	<p>Functional cookies enhance functions, performance, and services on the website. Some examples include: cookies used to analyze site traffic, cookies used for market research, and cookies used to display advertising that is not directed to a particular individual.</p> <p>Functional cookies may also be used to improve how our websites function and to help us provide you with more relevant communications, including marketing communications. These cookies collect information about how our websites are used, including which pages are viewed most often.</p> <p>We may use our own technology or third-party technology to track and analyze usage information to provide enhanced interactions and more relevant communications, and to track the performance of our advertisements.</p> <p>Idea Design may also use HTML5 local storage or Flash cookies for the above-mentioned purposes. These technologies differ from browser cookies in the amount and type of data they store, and how they store it.</p>	<p>We need your prior consent to use functional cookies. To change your cookie settings and preferences, including those for functional cookies, click the Cookie Preferences link in the footer of the page.</p> <p>To learn how to control functional cookies via your individual browser settings, click <a href="#">here</a>.</p> <p>To learn how to manage privacy and storage settings for Flash cookies, click <a href="#">here</a></p>
Advertising cookies	<p>Advertising cookies track activity across websites in order to understand a viewer's interests and to direct marketing to them.</p> <p>We sometimes use cookies delivered by us or by third parties to show you ads for our products that we think</p>	<p>We need your prior consent to use of targeting and advertising cookies. To change your cookie settings and preferences, including those for targeting and advertising cookies,</p>

	<p>may interest you on devices you use and to track the performance of our advertisements. For example, these cookies collect information such as which browser you used when visiting our websites.</p> <p>Idea Design also contracts with third-party advertising networks that collect IP addresses and other information from web beacons on our websites, from emails and on third-party websites. Advertising networks follow your online activities over time and across different websites or other online services by collecting certain data through automated means, including through the use of cookies. These technologies may recognize you across the different devices you use. When we work with third party advertising networks, we require them to restrict their data processing to only what is necessary to provide us with the advertising services we request.</p>	<p>click the Cookie Preferences link in the footer of the page.</p> <p>See Section 4.3, below, to learn more about these and other advertising networks and your ability to opt out of collection by certain third parties.</p>
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4.3 Notices on behavioral advertising and opt-out for website visitors

As described above, we or one of our authorized partners may place or read cookies on your device when you visit our websites for the purpose of serving you targeted advertising (also referred to as “online behavioral advertising” or “interest-based advertising”). To learn more about targeted advertising and advertising networks, please visit the opt-out pages of the Network Advertising Initiative, [here](#), and the Digital Advertising Alliance, [here](#).

To manage the use of targeting and advertising cookies on this website, click the Cookie Preferences link in the footer of the page or consult your individual browser settings for cookies. To learn how to manage privacy and storage settings for Flash cookies, click [here](#). Various browsers may also offer their own management tools for removing HTML5 local storage.

4.4 Opt-Out from the setting of cookies on your individual browser

In addition to using the user preference center, in many cases you may opt-out from the collection of non-essential device data on your web browser (see Section 4.1 above) by managing your cookies at the browser or device level. In addition, if you wish to opt-out of interest-based advertising, click [here](#) (or, if located in the European Union or United Kingdom, click [here](#)). Please note, however, that by blocking or deleting cookies and similar technologies used on our websites, you may not be able to take full advantage of the websites.

While some internet browsers offer a “do not track” or “DNT” option that lets you tell websites that you do not want to have your online activities tracked, these features are not yet uniform and there is no common standard adopted by industry groups, technology companies, or regulators. Therefore, we do

not currently commit to responding to browsers' DNT signals with respect to our websites. Idea Design takes privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

#### 4.5 Social Media Features

Our websites may use social media features, such as the "Tweet" button and other sharing widgets ("Social Media Features"). Social Media Features may allow you to post information about your activities on our website to outside platforms and social networks. Social Media Features may also allow you to like or highlight information we have posted on our website or our branded social media pages. Social Media Features are either hosted by each respective platform or hosted directly on our website. To the extent the Social Media Features are hosted by the platforms themselves, and you click through to these from our websites, the platform may receive information showing that you have visited our websites. If you are logged in to your social media account, it is possible that the respective social media network can link your visit to our websites with your social media profile.

Your interactions with Social Media Features are governed by the privacy policies of the companies providing them.

#### 5. Purposes for which we process Personal Data and the legal bases on which we rely

We collect and process your Personal Data (including, where legally permissible, special categories of Personal Data) for the following purposes and relying on the following legal bases:

Purpose	Description	Legal basis
Websites and social media branded pages		
Providing our websites (including our social media pages)	We process your Personal Data to operate and administer our websites and to provide you with the content you access and request	Our legitimate interest in providing online content to our customers and prospective customers regarding our service offering and related information
Improving our websites	We process your Personal Data to analyze overall trends and help us improve the user experience on our websites	Our legitimate interest in providing a relevant and well-functioning website for the benefit of our website visitors
Promoting the security of our websites	We process your Personal Data by tracking use of our websites and verifying and investigating activity	Our legitimate interest in promoting the safety and security of our websites and in protecting our rights and the rights of others
Displaying personalized advertisements and content	We process your Personal Data to conduct market research, advertise to you, provide personalized information about us on and off our websites and to	Our legitimate interest in advertising our products and services or, where necessary, to the extent you have provided your prior consent



	provide other personalized content based upon your activities and interests	Please see Section 10 below, to learn how you can control the processing of your Personal Data by Idea Design for personalized advertising purposes
Office visitors and events		
Registering visitors	We process your Personal Data, including registration information and associated non-disclosure information, for security reasons	Our legitimate interest in protecting our offices, staff, visitors and our confidential information against unauthorized access
Managing event registrations and attendance	We process your Personal Data to plan and host events or webinars for which you have registered or that you attend, including sending related communications to you	Performance of a contract or where we receive your consent
Ensuring the health and safety of our visitors and employees	We process your Personal Data (which may include special categories of Personal Data) (where legally permitted) during office visits and at events during the COVID-19 pandemic to ensure the health and safety of our visitors and employees	Consent and explicit consent or in our legitimate interest to ensure the health of our employees and visitors where necessary for reasons of public interest in the area of public health
Communications		
Sending communications	We process your Personal Data to send you marketing information, product recommendations and other non-transactional communications (e.g., marketing newsletters, telemarketing calls, SMS or push notifications, information about our products, news or events) about us, our affiliates and partners	Our legitimate interest in conducting direct marketing or where you have provided your prior consent (please see Section 10 below to learn how you can control the processing of your Personal Data by Idea Design for marketing purposes)
Recording phone calls	We process your Personal Data, including recording phone calls (in accordance with applicable laws) for training, quality assurance, and administration purposes	Consent or our legitimate interest in maintaining the high quality of our phone calls with users

	If required under applicable law, we will give you the option to object to a call being recorded	
Handling contact and user support requests	We process your Personal Data, if you fill out a “Contact Me” web form or request user support, or if you contact us by other means including but not limited to via phone	Necessary for the performance of a contract or our legitimate interest in fulfilling your requests and communicating with you
Idea Design products and services		
Provision of services	We process your Personal Data to perform our contract with you for the provision of our services and to satisfy our obligations under the applicable terms of use	Necessary for the performance of a contract or our legitimate interest to provide and administer our services
Billing and account management	We process your Personal Data (including Usage Data) to bill for our services and manage customer accounts generally	Necessary for the performance of a contract or our legitimate interest in the management of customer accounts
Internal reporting and business modeling	We process your Personal Data (including Usage Data) for internal reporting and business modeling purposes (e.g., forecasting, revenue, capacity planning, product strategy)	Our legitimate interest in the management of our business operations
Security	We process your Personal Data (including your Usage Data) for the purposes of maintaining Idea Design’s own security, including investigating, detecting and preventing suspicious activity, fraud and cybercrime that may affect Idea Design or its services	Our legitimate interest in promoting the safety and security of Idea Design generally and to protect our rights and the rights of others
Compensation	We process your Personal Data (including your Usage Data) for the purposes of determining compensation for Idea Design employees, such as commission	Necessary for the performance of a contract with an employee or our legitimate interest in fairly compensating our employees

Financial reporting	We process your Personal Data (including your Usage Data) for the purposes of financial reporting	Our legitimate interest in meeting our obligations associated with the reporting of our finances
Aggregating data	We process your Personal Data (including your Usage Data) for the purposes of aggregating this information to ensure that it is no longer identifying	Our legitimate interest in minimizing the amount of Personal Data processed as part of the noted processing activity
Webinars, programs, trainings, certifications and contests		
Managing, and participating in, webinars, contests, programs, training, certifications or promotions	We process your Personal Data if you register for a webinar, contest, promotion, training, certification or a program. Some webinars, contests, programs, trainings, certifications and promotions have additional rules containing information about how we will process your Personal Data	Necessary for the performance of a contract or where we seek your consent
Other data collection		
Managing payments	If you have provided financial information to us, we process your Personal Data to verify that information and to collect payments to the extent that doing so is necessary to complete a transaction and perform our contract with you	Necessary for the performance of a contract
Administering surveys and conducting research	We process your Personal Data (including, where legally permitted, special categories of Personal Data) in order to meet the goals set out in surveys or research as well as to analyze our compliance with internal policies	Consent or explicit consent (if required under applicable law) or our legitimate interest in conducting the survey or research based on its stated goals (where no special categories of Personal Data are in scope)
Collection of diversity information	We process your Personal Data (including special categories of Personal Data) to the extent you voluntarily consent to provide it to meet our broader community goals related to diversity and equality of opportunity	Consent or explicit consent (if required under applicable law)
Compliance with legal obligations	We process your Personal Data (including Usage Data) when	Legal obligation or our legitimate interest in protecting against misuse or

	cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Data to protect our rights	abuse of our websites or services, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes, responding to lawful requests, or for auditing purposes
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If we need to collect and process Personal Data by law, or under a contract we have entered into with you, and you fail to provide the required Personal Data when requested, we may not be able to perform our contract with you.

6. Who do we share Personal Data with?

We may share your Personal Data as follows:

- Service providers: With our contracted service providers, who provide services such as IT and system administration and hosting, credit card processing, research and analytics, marketing, customer support and data enrichment for the purposes and pursuant to the legal bases described above in Section 5;
- Idea Design affiliates: With affiliates within the Idea Design corporate group and companies that we acquire in the future after they are made part of the Idea Design corporate group, to the extent such sharing of data is necessary to fulfill a request you have submitted via our websites or for customer support, marketing, technical operations, event registration and account management purposes.
- Event sponsors: If you attend an event or webinar organized by us, or download or access an asset on our website, we may share your Personal Data with sponsors of the event. If required by applicable law, you may consent to such sharing via the registration form or by allowing your attendee badge to be scanned at a sponsor booth. In these circumstances, your information will be subject to the sponsors’ privacy statements. If you do not wish for your information to be shared, you may choose to not opt-in via event/webinar registration or elect to not have your badge scanned, or you can opt-out in accordance with Section 10 below;
- Partners: With specific partners that offer supplementary services to those provided by Idea Design, to the extent you consent to such sharing (where required by applicable law);
- Customers with whom you are affiliated: If you use our services as an authorized user, we may share your Personal Data with your affiliated customer responsible for your access to the services to the extent this is necessary for verifying accounts and activity, investigating suspicious activity, or enforcing our terms and policies;
- Contest and promotion sponsors: With sponsors of contests or promotions for which you register in order to fulfill the contest or promotion;

- Third party networks and websites: With third-party social media networks, advertising networks and websites, so that Idea Design can market and advertise on third party platforms and websites;
- Professional advisers: In individual instances, we may share your Personal Data with professional advisers acting as service providers, processors, or joint controllers - including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services, and to the extent we are legally obliged to share or have a legitimate interest in sharing your Personal Data;
- Third parties involved in a corporate transaction: If we are involved in a merger, reorganization, dissolution or other fundamental corporate change, or sell a website or business unit, or if all or a portion of our business, assets or stock are acquired by a third party. In accordance with applicable laws, we will use reasonable efforts to notify you of any transfer of Personal Data to an unaffiliated third party; and

We may also share anonymous or de-identified Usage Data with Idea Design's service providers for the purpose of helping Idea Design in such analysis and improvements. Additionally, Idea Design may share such anonymous or de-identified Usage Data on an aggregate basis in the normal course of operating our business; for example, we may share information publicly to show trends about the general use of our services.

Anyone using our communities, forums, blogs, or chat rooms on our websites may read any Personal Data or other information you choose to submit and post.

For more information on the recipients of your Personal Data, please contact us by using the information in Section 13 below.

## 7. Children

Our websites and services are not directed at children. We do not knowingly collect Personal Data from children under the age of 16, or such other applicable age of consent for privacy purposes in relevant individual jurisdictions, unless (a) we have obtained consent from a parent or guardian, (b) such collection is subject to a separate agreement with us or (c) the visit by a child is unsolicited or incidental. If you are a parent or guardian and believe your child has provided us with Personal Data without your consent, please contact us by using the information in Section 13 below and we will take steps to delete their Personal Data from our systems.

## 9. How long do we keep your Personal Data?

We may retain your Personal Data for a period of time consistent with the original purpose of collection (see Section 5 above) or as long as required to fulfill our legal obligations. We determine the appropriate retention period for Personal Data on the basis of the amount, nature, and sensitivity of the Personal Data being processed, the potential risk of harm from unauthorized use or disclosure of the Personal Data, whether we can achieve the purposes of the processing through other means, and on the basis of applicable legal requirements (such as applicable statutes of limitation).

After expiry of the applicable retention periods, your Personal Data will be deleted. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will implement appropriate measures to prevent any further use of such data.

For more information on data retention periods, please contact us by using the information in the Section 13 below.

## 10. Your rights relating to your Personal Data

### 10.1 Your rights

You may have certain rights relating to your Personal Data, subject to local data protection laws. Depending on the applicable laws these rights may include the right to:

- Access your Personal Data held by us;
- Know more about how we process your Personal Data;
- Rectify inaccurate Personal Data and, taking into account the purpose of processing the Personal Data, ensure it is complete;
- Erase or delete your Personal Data;
- Restrict our processing of your Personal Data;
- Transfer your Personal Data to another controller, to the extent possible;
- Object to any processing of your Personal Data;
- Opt out of certain disclosures of your Personal Data to third parties;
- If you're under the age of 16, or such other applicable age of consent for privacy purposes in relevant individual jurisdictions, opt in to certain disclosures of your Personal Data to third parties;
- Not be discriminated against for exercising your rights described above;
- Withdraw your consent at any time (to the extent we base processing on consent), without affecting the lawfulness of the processing based on such consent before its withdrawal.

Where we process your Personal Data for direct marketing purposes or share it with third parties for their own direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection.

### 10.2 How to exercise your rights

To exercise your rights, please contact us by using the information in Section 13 below. Your Personal Data may be processed in responding to these rights. We try to respond to all legitimate requests within

two months unless otherwise required by law, and will contact you if we need additional information from you in order to honor your request or verify your identity. If you are an employee of an Idea Design customer, we recommend you contact your employer's system administrator for assistance in correcting or updating your information.

Some registered users may update their user settings, profiles, organization settings and event registrations by logging into their accounts and editing their settings or profiles.

To update your billing information, discontinue your account or request return or deletion of your Personal Data and other information associated with your account, please contact us by using the information in Section 13 below.

### 10.3 Your rights relating to customer data

As described above, we may also process Personal Data submitted by or for a customer to our products and services. To this end, if not stated otherwise in this Privacy Statement or in a separate disclosure, we process such Personal Data as a processor on behalf of our customer (and its affiliates) who is the controller of the Personal Data (see Section 1 above). We are not responsible for and have no control over the privacy and data security practices of our customers, which may differ from those explained in this Privacy Statement. If your data has been submitted to us in our role as a processor by or on behalf of an Idea Design customer and you wish to exercise any rights you may have under applicable data protection laws, please inquire with them directly. Because we may only access a customer's data upon their instructions, if you wish to make your request directly to us, please provide us the name of the Idea Design customer who submitted your data to us. We will refer your request to that customer, and will support them as needed in responding to your request within a reasonable timeframe.

### 10.4 Your preferences for email and SMS marketing communications

If we process your Personal Data for the purpose of sending you marketing communications, you may manage your receipt of marketing and non-transactional communications from Idea Design by clicking on the "unsubscribe" link located on the bottom of Idea Design marketing emails, by replying or texting 'STOP' if you receive Idea Design SMS communications.

You may also turn off push notifications on Idea Design apps on your device, or unsubscribe by contacting us using the information in the "Contacting us" section, below.

Please note that opting out of marketing communications does not opt you out of receiving important business communications related to your current relationship with us, such as communications about your subscriptions or event registrations, service announcements or security information.

### 10.5 Your preferences for telemarketing communications

If you want your phone number to be added to our internal Do-Not-Call telemarketing register, please contact us by using the information in Section 13 below. Please include your first name, last name, company and the phone number you wish to add to our Do-Not-Call register.

Alternatively, you can always let us know during a telemarketing call that you do not want to be called again for marketing purposes.

## 11. How we secure your Personal Data

We take appropriate precautions including organizational, technical, and physical measures to help safeguard against accidental or unlawful destruction, loss, alteration, and unauthorized disclosure of, or access to, the Personal Data we process or use.

While we follow generally accepted standards to protect Personal Data, no method of storage or transmission is 100% secure. You are solely responsible for protecting your password, limiting access to your devices and signing out of websites after your sessions. If you have any questions about the security of our websites, please contact us by using the information in Section 13 below.

## 12. Changes to this Privacy Statement

We will update this Privacy Statement from time to time to reflect changes in our practices, technologies, legal requirements, and other factors. If we do, we will update the “effective date” at the top. If we make a material update, we may provide you with notice prior to the update taking effect, such as by posting a notice on our website or by contacting you directly, or where required under applicable law and feasible, seek your consent to these changes.

We encourage you to periodically review this Privacy Statement to stay informed about our collection, processing and sharing of your Personal Data.

## 13. Contacting us

Idea Design has appointed a Data Protection Officer. To exercise your rights regarding your Personal Data, or if you have questions regarding this Privacy Statement or our privacy practices please email us at [sales@Ideadesignusa.com](mailto:sales@Ideadesignusa.com) or write to us at:

Idea Design Privacy Team

117 E 57<sup>th</sup> Street #31CD

New York, NY 10022, USA

When you contact us, please indicate in which country and/or state you reside.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, and you are located in the European Economic Area or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority.

## 14. Additional Disclosures for California Residents

The California Consumer Privacy Act requires businesses to disclose whether they sell Personal Data. As a business covered by the CCPA, we do not sell Personal Data. We may share Personal Data with third parties or allow them to collect Personal Data from our sites or services if those third parties are authorized service providers or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such Personal Data, or if you use Idea Design sites or services to interact with third parties or direct us to disclose your Personal Data to third parties.

California law requires that we detail the categories of Personal Data that we disclose for certain “business purposes,” such as to service providers that assist us with securing our services or marketing



our products, and to such other entities as described in Sections 5 and 6 of this Privacy Statement. We disclose the following categories of Personal Data for our business purposes:

- Identifiers;
- Commercial information;
- Internet activity information;
- Financial information;
- Professional and employment-related information;
- Education information; and
- Inferences drawn from any of the above information categories.

California law grants state residents certain rights, including the rights to access specific types of Personal Data, to learn how we process Personal Data, to request deletion of Personal Data, and not to be denied goods or services for exercising these rights.

If you are a California resident under the age of 18 and have registered for an account with us, you may ask us to remove content or information that you have posted to our website(s). Please note that your request does not ensure complete or comprehensive removal of the content or information, because, for example, some of your content may have been reposted by another user.

For information on how to exercise your rights, please refer to Section 10.2 of this Privacy Statement. If you are an authorized agent wishing to exercise rights on behalf of a California resident, please contact us using the information in the “Contacting Us” section above and provide us with a copy of the consumer’s written authorization designating you as their agent.

We may need to verify your identity and place of residence before completing your rights request.

#### California Privacy Rights Reporting

	Requests Submitted	Requests Fulfilled in Whole Or In Part*	Average Days to Respond	Median Days to Complete a Request**
Requests for access to Personal Data	0	0	0	0
Requests to delete Personal Data	0	0	0	0
Objections to processing Personal Data	0	0	0	0

\*Requests may be unable to be completed due to factors like the inability to verify the resident's identity or lack of response.

\*\*Time to complete a request may depend in part on receipt of information from the person making the request, such as information to verify the person's identity or information about the action requested.

Data is for all requests received by the Idea Design Family Affiliates from California residents between January 1 and December 31, 2021.