



# Preava General Privacy Notice

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Effective on: October 22<sup>nd</sup>, 2020

Last updated on: January 29<sup>th</sup>, 2024

## **Introduction**

Preava, Inc. (“Preava”, “we”, “us”, “our”) takes the protection of personal data (“Personal Data”) very seriously. Please read this privacy notice (the “Notice”) to learn what we are doing with your Personal Data, how we protect it, and what privacy rights you may have under data protection and privacy laws, such as:

- the European Union General Data Protection Regulation (“GDPR”); and
- U.S. state privacy laws, including but not limited to the California Consumer Privacy Act (“CCPA”); the Colorado Privacy Act; the Connecticut Data Privacy Act; and the Virginia Consumer Data Protection Act. Collectively, these laws and their associated regulations, if any, are referred to as “U.S. State Privacy Laws.”

## **What Is Covered by this Privacy Notice?**

This Notice addresses data subjects (which includes both individuals and households) whose Personal Data we:

- receive directly through our website(s);
- receive from our business partners; or
- process to promote our products and services.

## **What Is Not Covered in this Privacy Notice?**

### **Application Personal Data**

This Notice does not apply to the Personal Data received from our direct customers (“Customers”) in our web-based software application (the “Application”). Please see the [Application Privacy Notice](#) for more information.

### **Human Resources Personal Data**

This Notice does not apply to the Personal Data of employees, job applicants, contractors, business owners, directors, or officers of Preava.

### **Information Which Does Not Constitute Personal Data**

If we do not maintain information in a manner that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular individual or household, such information is not considered “Personal Data” and this Notice will not apply to our processing of that information.

## **What Can You Find in this Notice?**

This Notice tells you, among other things:

- What Personal Data we collect about you and how we obtain it;
- The legal bases for processing your Personal Data;
- For what purposes we use that Personal Data;
- How long we keep your Personal Data;
- To whom we disclose your Personal Data;
- Your rights about the Personal Data we collect about you and how you can exercise those rights;
- How we protect your Personal Data; and
- How to contact us.

### **Our Role with Respect to Your Personal Data**

There is Personal Data that we process for our own purposes and Personal Data that we process on behalf of our Customers. This means that we do not always have the same degree of decision-making with respect to why and how each piece of Personal Data will be processed.

- Regarding the Personal Data of users of our website(s) generally or business contacts and prospects of Preava, we decide the purposes and means of processing, and consequently act as a data controller or “business.”
- Regarding the Personal Data of individuals that we receive from our Customers in the Application, we generally process Personal Data as a “service provider” or data processor on behalf of our Customers, who use our Application to store and process Personal Data of themselves, their own customers, clients, employees, and others. However, we may act as a data controller or “business” for Application Personal Data in some circumstances. Please see the Application Privacy Notice for more information. Where we act as a “service provider” or data processor and you give your data to one of our Customers or where we collect your Personal Data on their behalf, our Customer’s privacy notice, rather than this Notice, will apply to our processing of your Personal Data. If you have a direct relationship with one of our Customers, please contact them to exercise your privacy rights.

### **Lawful Bases for Processing**

We must have a valid reason to use your Personal Data. This is called the “lawful basis for processing.” When operating as a data controller, we may process your Personal Data on the basis of:

- your consent;
- our legitimate interests, such as our interest in marketing and developing our services and our interest in promoting the safety and security of our website and services;
- the need to comply with the law; or
- any other ground, as required or permitted by law.

When we rely on legitimate interests as a lawful basis of processing, you have the right to ask us more about how we decided to choose this legal basis. To do so, please use the contact details provided here.

Where we process your Personal Data based on your consent, you may withdraw it at any time. However, this will not affect the lawfulness of our processing before you withdraw your consent. It will also not affect the validity of our processing of Personal Data performed on other lawful grounds.

### What Personal Data We Process and How We Obtain It

The table below describes the categories of Personal Data we have collected about you in the last twelve months.

<b>Personal Data We Collect, Process, or Store</b>	<b>How We Obtain It</b>
<p><i>Identifiers</i></p> <p>A real name, alias, postal address, phone number, signature, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.</p>	<ul style="list-style-type: none"> <li>• You provide it directly to us when you:               <ul style="list-style-type: none"> <li>○ visit our websites or social media sites;</li> <li>○ ask a question, fill in a form, make a complaint, or comment about one of our products or services;</li> <li>○ use our live chat;</li> <li>○ sign up as a Customer;</li> <li>○ sign up for one of our events; or</li> <li>○ use one of our services in person or by phone.</li> </ul> </li> <li>• Our Customers (including their employees, contractors, and other representatives) provide it to us;</li> <li>• You, as a representative of one of our Customers, give it directly to us for the purposes of sales or Customer support;</li> <li>• We receive it from other companies within our corporate group;</li> <li>• Our vendors provide it to us;</li> <li>• When a friend of yours or one of our business partners refers you to our services by providing your Personal Data to us; and</li> <li>• When we purchase lists of individuals who might be interested in becoming Customers of ours.</li> </ul>
<p><i>Financial information</i></p> <p>A bank account number, credit card number, debit card number, or any other financial information.</p>	<ul style="list-style-type: none"> <li>• You provide it directly to us when you:               <ul style="list-style-type: none"> <li>○ sign up as a Customer;</li> <li>○ sign up for one of our events; or</li> <li>○ use one of our services in person or by phone.</li> </ul> </li> <li>• You, as a representative of one of our Customers, give it directly to us for the purposes of sales or Customer support.</li> </ul>

<p><i>Commercial information</i></p> <p>Records of personal property, products, or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> <li>• Our Customers (including their employees, contractors, and other representatives) provide it to us;</li> <li>• You, as a representative of one of our Customers, give it directly to us for the purposes of sales or Customer support;</li> <li>• We receive it from other companies within our corporate group;</li> <li>• Our vendors provide it to us;</li> <li>• When a friend of yours or one of our business partners refers you to our services by providing your Personal Data to us; and</li> <li>• When we purchase lists of individuals who might be interested in becoming Customers of ours.</li> </ul>
<p><i>Internet or other similar network activity</i></p> <p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement history.</p>	<ul style="list-style-type: none"> <li>• You provide it directly to us when you: <ul style="list-style-type: none"> <li>○ visit our websites or social media sites; or</li> <li>○ ask a question, fill in a form, make a complaint, or comment about one of our products or services.</li> </ul> </li> <li>• We receive it from other companies within our corporate group;</li> <li>• Our vendors provide it to us; and</li> <li>• When we purchase lists of individuals who might be interested in becoming Customers of ours.</li> </ul>
<p><i>Geolocation data</i></p> <p>Physical location or movements.</p>	<ul style="list-style-type: none"> <li>• You provide it directly to us when you visit our website.</li> </ul>
<p><i>Professional or employment-related information</i></p> <p>Current or past job history or performance evaluations, job title.</p>	<ul style="list-style-type: none"> <li>• You provide it directly to us when you: <ul style="list-style-type: none"> <li>○ ask a question, fill in a form, make a complaint, or comment about one of our products or services;</li> <li>○ use our live chat;</li> <li>○ sign up as a Customer;</li> <li>○ sign up for one of our events; or</li> <li>○ use one of our services in person or by phone.</li> </ul> </li> <li>• Our Customers (including their employees, contractors, and other representatives) provide it to us;</li> <li>• You, as a representative of one of our Customers, give it directly to us for the purposes of sales or Customer support;</li> </ul>

	<ul style="list-style-type: none"> <li>• We receive it from other companies within our corporate group;</li> <li>• Our vendors provide it to us;</li> <li>• When a friend of yours or one of our business partners refers you to our services by providing your Personal Data to us; and</li> <li>• When we purchase lists of individuals who might be interested in becoming Customers of ours.</li> </ul>
<p><i>Inferences drawn from other Personal Data</i></p> <p>Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<ul style="list-style-type: none"> <li>• You provide it directly to us when you: <ul style="list-style-type: none"> <li>○ visit our websites or social media sites;</li> <li>○ ask a question, fill in a form, make a complaint, or comment about one of our products or services;</li> <li>○ use our live chat;</li> <li>○ sign up as a Customer;</li> <li>○ sign up for one of our events;</li> <li>○ use one of our services in person or by phone; or</li> <li>○ you visit one of our offices.</li> </ul> </li> <li>• Our Customers (including their employees, contractors, and other representatives) provide it to us;</li> <li>• You, as a representative of one of our Customers, give it directly to us for the purposes of sales or Customer support;</li> <li>• We receive it from other companies within our corporate group;</li> <li>• Our vendors provide it to us;</li> <li>• When a friend of yours or one of our business partners refers you to our services by providing your Personal Data to us; and</li> <li>• When we purchase lists of individuals who might be interested in becoming Customers of ours.</li> </ul>

We will not intentionally collect additional categories of Personal Data without informing you. However, we cannot control what Personal Data you or any other sources of Personal Data may provide to us that does not reasonably fit with our defined purposes for which we process your Personal Data. If we process any Personal Data that is not described in this Notice, we will process that Personal Data according to this Notice and pursuant to applicable data protection laws.

**Cookies**

A “cookie” is a small file stored on your device that contains information about your device. We may use cookies to provide basic relevant ads, website functionality,

authentication (session management), usage analytics (web analytics), to remember your settings, and to generally improve our websites.

We use session and persistent cookies. Session cookies are deleted when you close your browser. Persistent cookies may remain even after you close your browser, but always have an expiration date. Most of the cookies placed on your device through our websites are first-party cookies which are placed directly by us. Other parties, such as Google, may also set their own (third-party) cookies through our websites. Please refer to the policies of these third parties to learn more about the way in which they collect and process information about you.

If you would prefer not to accept cookies, you can change the setup of your browser to reject all or some cookies. Note, if you reject certain cookies, you may not be able to use all features of our website or services. For more information, please visit <https://www.aboutcookies.org/>.

You may also set your browser to send a Do Not Track (DNT) signal. For more information, please visit <https://allaboutdnt.com/>. Please note that our website does not have the capability to respond to “Do Not Track” signals received from web browsers.

For more information about our use of cookies, please see our [Cookie Notice](#).

### **For What Purposes Do We Use Your Personal Data?**

We may process your Personal Data for the following business purposes:

- providing you with information that you request from us;
- responding to your requests or questions;
- fulfilling legal obligations and enforcing our rights;
- improving our websites;
- improving our products and service offerings; and
- sending you email marketing communications about our business which we think may interest you.

### **How Long We Keep Your Personal Data**

When the purposes of processing are satisfied, we will delete the related Personal Data within six (6) months or upon receipt of a verified request.

### **Disclosing Personal Data to Third Parties**

We do not “sell” or “share” your Personal Data (as those terms are defined in the CCPA) to third parties within the context of this Notice. In the preceding twelve (12) months, however, we have disclosed the following categories of Personal Data to other parties for business purposes:

<b>Category</b>	<b>Categories of Third Parties Receiving Personal Data</b>
Identifiers	<ul style="list-style-type: none"><li>• Communication service providers</li><li>• Consent management providers</li><li>• Financial management providers</li></ul>

	<ul style="list-style-type: none"> <li>• Identity and access management tool providers</li> <li>• Infrastructure services providers</li> <li>• Marketing service providers</li> <li>• Office tools providers</li> <li>• Payment processing providers</li> <li>• Project management tool providers</li> <li>• Web analytics providers</li> </ul>
Financial information	<ul style="list-style-type: none"> <li>• Communication service providers</li> <li>• Financial management providers</li> <li>• Marketing service providers</li> <li>• Office tools providers</li> <li>• Payment processing providers</li> </ul>
Commercial information	<ul style="list-style-type: none"> <li>• Communication service providers</li> <li>• Marketing service providers</li> <li>• Office tools providers</li> </ul>
Internet or other similar network activity	<ul style="list-style-type: none"> <li>• Communication service providers</li> <li>• Consent management providers</li> <li>• Marketing service providers</li> <li>• Office tools providers</li> <li>• Payment processing providers</li> <li>• Web analytics providers</li> </ul>
Geolocation data	<ul style="list-style-type: none"> <li>• Consent management providers</li> <li>• Identity and access management tool providers</li> <li>• Infrastructure services providers</li> <li>• Marketing service providers</li> <li>• Office tools providers</li> <li>• Payment processing providers</li> <li>• Web analytics providers</li> </ul>
Professional or employment-related information	<ul style="list-style-type: none"> <li>• Communication service providers</li> <li>• Financial management providers</li> <li>• Identity and access management tool providers</li> <li>• Infrastructure services providers</li> <li>• Marketing service providers</li> <li>• Office tools providers</li> <li>• Payment processing providers</li> <li>• Project management tool providers</li> <li>• Web analytics providers</li> </ul>
Inferences drawn from other Personal Data	<ul style="list-style-type: none"> <li>• Communication service providers</li> <li>• Infrastructure services providers</li> <li>• Marketing service providers</li> <li>• Office tools providers</li> <li>• Web analytics providers</li> </ul>

When you use our website, certain third parties may collect Personal Data about your online activities over time and across different websites or online services. Please refer to the policies of these third parties to learn more about the way in which they collect and process information about you.

Some of these third parties may be located outside of the European Union or the European Economic Area (“EEA”), the United Kingdom (“UK”), or Switzerland. In some cases, the European Commission may have determined that in some countries, their data protection laws provide a level of protection equivalent to European Union law. You can see [here](#) the list of countries that the European Commission has recognized as providing an adequate level of protection to personal data. We will only transfer your Personal Data to third parties in countries not recognized as providing an adequate level of protection to personal data when there are appropriate safeguards in place. These safeguards may include the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework, or the Standard Contractual Clauses (“SCCs”) as approved by the European Commission under Article 46.2 of the GDPR. Preava remains liable for the protection of your Personal Data that we transfer or have transferred to third parties, except to the extent that we are not responsible for the event that leads to any unauthorized or improper processing.

### **Other Disclosures of Your Personal Data**

We may disclose your Personal Data to the extent required by law, or if we have a good-faith belief that we need to disclose it in order to comply with official investigations or legal proceedings (whether initiated by governmental/law enforcement officials, or private parties). If we have to disclose your Personal Data to governmental/law enforcement officials, we may not be able to ensure that those officials will maintain the privacy and security of your Personal Data.

We may also disclose your Personal Data if we sell or transfer all or some of our company’s business interests, assets, or both, or in connection with a corporate restructuring. Finally, we may disclose your Personal Data to our subsidiaries or affiliates, but only if necessary for business purposes, as described in the section above.

We reserve the right to use, transfer, sell, share, and disclose aggregated, anonymous data for any legal purpose. Such data does not include any Personal Data. The purposes may include analyzing usage trends or seeking compatible advertisers, sponsors, and Customers.

### **What Privacy Rights Do You Have?**

You have specific rights regarding your Personal Data that we collect and process. Please note that you can only exercise these rights with respect to Personal Data that we process about you when we act as a data controller or as a “business” under the CCPA. To exercise your rights with respect to information processed by us on behalf of one of our Customers, please read the privacy notice of that Customer.

In this section, we first describe those rights and then we explain how you can exercise those rights.

### **Right to Know What Happens to Your Personal Data**

This is called the right to be informed. It means that you have the right to obtain from us all information regarding our data processing activities that concern you, such as how we collect and use your Personal Data, how long we will keep it, and whom it will be disclosed to, among other things.

We are informing you of how we process your Personal Data with this Notice.

### **Right to Know What Personal Data Preava Has About You**

This is called the right of access. This right allows you to ask for full details of the Personal Data we hold about you, including confirmation of whether or not we process Personal Data concerning you, and, where that is the case, a copy or access to the Personal Data and certain related information.

Once we receive and confirm that the request came from you or your authorized agent, we will disclose to you:

- The categories of your Personal Data that we process;
- The categories of sources for your Personal Data;
- Our purposes for processing your Personal Data;
- Where possible, the retention period for your Personal Data, or, if not possible, the criteria used to determine the retention period;
- The categories of third parties to whom we disclose your Personal Data;
- If we carry out automated decision-making, including profiling, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you;
- The specific pieces of Personal Data we process about you in an easily sharable format;
- If we sold or disclosed your Personal Data for a business purpose, the categories of Personal Data and categories of recipients of that Personal Data;
- If we rely on legitimate interests as a lawful basis to process your Personal Data, the specific legitimate interests; and
- The appropriate safeguards used to transfer Personal Data from the EEA to a third country, if applicable.

Under some circumstances, we may deny your access request. In that event, we will respond to you with the reason for the denial.

Some U.S. State Privacy Laws do not allow us to disclose Social Security numbers, driver's license numbers or other government-issued identification numbers, financial account numbers, any health insurance or medical identification numbers, account passwords, or security questions and answers. We can inform you that we have this information generally, but we may not provide the specific numbers, passwords, etc. to you for security and legal reasons.

### **Right to Change Your Personal Data**

This is called the right to rectification. It gives you the right to ask us to correct without undue delay anything that you think is wrong with the Personal Data we have on file about you, and to complete any incomplete Personal Data.

### **Right to Delete Your Personal Data**

This is called the right to erasure, right to deletion, or the right to be forgotten. This right means you can ask for your Personal Data to be deleted.

Sometimes we can delete your information, but other times it is not possible for either technical or legal reasons. If that is the case, we will consider if we can limit how we use it. We will also inform you of our reason for denying your deletion request.

### **Right to Ask Us to Change How We Process Your Personal Data**

This is called the right to restrict processing. It is the right to ask us to only use or store your Personal Data for certain purposes. You have this right in certain instances, such as where you believe the data is inaccurate or the processing activity is unlawful.

### **Right to Opt-Out of Certain Processing**

Please note that Preava does not “sell” or “share” your Personal Data (as those terms are defined in the CCPA) to third parties within the context of this Notice. However, you may have the right to opt-out of certain other types of processing, such as processing for the purposes of targeted advertising or profiling for use in making automated decisions that significantly impact you.

### **Right to Ask Us to Stop Using Your Personal Data**

This is called the right to object. This is your right to tell us to stop using your Personal Data. You have this right where we rely on a legitimate interest of ours (or of a third party). You may also object at any time to the processing of your Personal Data for direct marketing purposes.

We will stop processing the relevant Personal Data unless: (i) we have compelling legitimate grounds for the processing that override your interests, rights, or freedoms; or (ii) we need to continue processing your Personal Data to establish, exercise, or defend a legal claim.

If we have received your Personal Data in reliance on the Data Privacy Framework, you may also have the right to opt out of having your Personal Data shared with third parties and to revoke your consent to our sharing your Personal Data with third parties. You may also have the right to opt out if your Personal Data is used for any purpose that is materially different from the purpose(s) for which it was originally collected or which you originally authorized.

### **Right to Port or Move Your Personal Data**

This is called the right to data portability. It is the right to ask for and receive a portable copy of your Personal Data that you have given us or that you have generated by using our services, so that you can:

- Move it;
- Copy it;
- Keep it for yourself; or
- Transfer it to another organization.

We will provide your Personal Data in a structured, commonly used, and machine-readable format. When you request this information electronically, we will provide you with a copy in electronic format.

### **Right to Withdraw Your Consent**

Where we rely on your consent as the legal basis for processing your Personal Data, you may withdraw your consent at any time. If you withdraw your consent, our use of your Personal Data before you withdraw is still lawful.

If you have given consent for your details to be disclosed to a third party and wish to withdraw this consent, please also contact the relevant third party in order to change your preferences.

### **Right to Non-Discrimination**

We will not discriminate against you for exercising any of your privacy rights. Unless the applicable data protection laws permit it, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Right to Lodge a Complaint with a Supervisory Authority**

If the GDPR applies to our processing of your Personal Data, you have the right to lodge a complaint with a supervisory authority if you are not satisfied with how we process your Personal Data.

Specifically, you can lodge a complaint in the Member State of the European Union of your habitual residence, place of work, or the alleged violation of the GDPR.

### **Right to Appeal a Denial of a Request to Exercise Your Privacy Rights**

Under certain U.S. State Privacy Laws, if we deny a request to exercise your privacy rights, you may have the right to appeal that decision. You can submit an appeal by responding to our correspondence regarding your request or by contacting us using the methods listed below for exercising your rights.

### **How Can You Exercise Your Privacy Rights?**

To exercise any of the rights described above, please submit a request by either:

- Contacting us by email at [privacy@preava.com](mailto:privacy@preava.com); or
- Writing to us by postal mail at:

Preava, Inc.  
Attn: Chief Privacy Officer  
22 Essex Way #8203  
Essex, VT 05451  
USA

### **Verification of Your Identity**

In order to correctly respond to your privacy rights requests, we need to confirm that YOU made the request. Consequently, we may require additional information to confirm that you are who you say you are.

We will verify your identity via the following methods: checking information provided by you against your account with us; or asking you about information that matches the information that we already have about you.

We will only use the Personal Data you provide us in a request to verify your identity or authority to make the request.

### **Verification of Authority**

If you are submitting a request on behalf of somebody else, we will need to verify your authority to act on behalf of that individual. When contacting us, please provide us with proof that the individual gave you signed permission to submit this request, a valid power of attorney on behalf of the individual, or proof of parental responsibility or legal guardianship. Alternatively, you may ask the individual to directly contact us by using the contact details above to verify their identity with Preava and confirm with us that they gave you permission to submit this request.

### **Response Timing and Format of Our Responses**

We will confirm the receipt of your request within ten (10) days, and, in that communication, we will also describe our identity verification process (if needed) and when you should expect a response, unless we have already granted or denied the request.

Please allow us up to one month to reply to your requests from the day we receive your request. If we need more time (up to three months or ninety (90) days, whichever is less, in total), we will inform you of the reason why and the extension period in writing.

If we cannot satisfy a request, we will explain why in our response. For data portability requests, we will choose a format to provide your Personal Data that is readily usable and should allow you to transmit the information from one entity to another entity without difficulty.

We will not charge a fee for processing or responding to your requests. However, we may charge a fee if we determine that your request is excessive, repetitive, or manifestly unfounded. In those cases, we will tell you why we made that determination and provide you with a cost estimate before completing your request.

## **Privacy of Children**

The websites are not directed at, or intended for use by, children under the age of 16.

## **Data Integrity & Security**

We are strongly committed to keeping your Personal Data safe. We have implemented and will maintain technical, administrative, and physical measures that are reasonably designed to help protect your Personal Data from unauthorized processing. Unauthorized processing includes unauthorized access, exfiltration, theft, disclosure, alteration, or destruction. Some of those protection measures include encryption and redaction, and we also have dedicated teams to look after information security and privacy.

## **Data Privacy Framework**

Preava complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Preava has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of Personal Data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Preava has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of Personal Data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Notice and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

## **Dispute Resolution**

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Preava commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact Preava by email at [privacy@preava.com](mailto:privacy@preava.com) or by postal mail at:

Preava, Inc.  
Attn: Chief Privacy Officer  
22 Essex Way, #8203  
Essex, VT 05451  
USA

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Preava commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to the VeraSafe Data Privacy Framework Dispute Resolution Procedure, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your

satisfaction, please visit <https://www.verasafe.com/privacy-services/dispute-resolution/submit-dispute/> for more information or to file a complaint. The services of the VeraSafe Data Privacy Framework Dispute Resolution Procedure are provided at no cost to you.

### **Binding Arbitration**

If your dispute or complaint related to your Personal Data that we received in reliance on the Data Privacy Framework cannot be resolved by us, nor through the dispute resolution mechanism mentioned above, you may have the right to require that we enter into binding arbitration with you under the Data Privacy Framework “Recourse, Enforcement and Liability” Principle and Annex I of the Data Privacy Framework. Additional information is available in Annex I: <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>.

### **U.S. Regulatory Oversight**

The Federal Trade Commission has jurisdiction over Preava’s compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

### **Data Transfer Mechanisms**

Preava uses the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, or the Standard Contractual Clauses (“SCCs”) as approved by the European Commission under Article 46.2 of the GDPR as its primary data transfer mechanisms for transferring Personal Data from the EU, UK, and Switzerland. These data transfer mechanisms are formally integrated into our agreements with third parties from whom and on behalf of whom we receive EU, UK, and Swiss Personal Data.

In addition, Preava regularly reviews and confirms its compliance with the most up-to-date guidance and obligations on valid data transfer under applicable privacy regulations. If we find it necessary to update the data transfer mechanism used, we will update this Privacy Notice accordingly.

### **Changes to this Notice**

If we make any material change to this Notice, we will post the revised Notice to this web page. We will also update the “last updated” date. By continuing to use our websites after we post any of these changes, you accept the modified Notice.

### **Contact Us**

If you have any other questions about this Notice or our processing of your Personal Data, please write to our Chief Privacy Officer by email at [privacy@preava.com](mailto:privacy@preava.com) or by postal mail at:

Preava, Inc.  
Attn: Chief Privacy Officer  
22 Essex Way, #8203  
Essex, VT 05451  
USA

Please allow up to four weeks for us to reply.

### **European Union Representative**

We have appointed VeraSafe as our representative in the EU for data protection matters. While you may also contact us, VeraSafe can be contacted on matters related to the processing of Personal Data. VeraSafe can be contacted using the contact form at: <https://verasafe.com/public-resources/contact-data-protection-representative>, by telephone at: +420 228 881 031, or by postal mail at:

#### **VeraSafe Ireland Ltd.**

Unit 3D North Point House  
North Point Business Park  
New Mallow Road  
Cork T23AT2P  
Ireland

### **United Kingdom Representative**

We have appointed VeraSafe as our representative in the UK for data protection matters. While you may also contact us, VeraSafe can be contacted on matters related to the processing of Personal Data. VeraSafe can be contacted using the contact form at: <https://verasafe.com/public-resources/contact-data-protection-representative>, by telephone at: +44 (20) 4532 2003, or by postal mail at:

#### **VeraSafe United Kingdom Ltd.**

37 Albert Embankment  
London SE1 7TL  
United Kingdom

### **Data Protection Officer**

We have appointed VeraSafe as our Data Protection Officer (DPO). While you may contact us directly, VeraSafe can also be contacted on matters related to the processing of Personal Data. VeraSafe's contact details are:

#### **VeraSafe**

100 M Street S.E., Suite 600  
Washington, D.C. 20003  
USA

Email: [experts@verasafe.com](mailto:experts@verasafe.com)

Web: <https://www.verasafe.com/about-verasafe/contact-us/>