



## **PRIVACY POLICY (EU/UK)**

**Effective Date: 1 June 2018**

### **1. Name and Contact Details of the Controller and the Company Data Protection Officer**

This Privacy Policy applies to data processing by

**Park Place Technologies, LLC**, 5910 Landerbrook Drive, Mayfield Heights, OH 44124,  
USA

regarding your use of its online customer portal and related services (e.g. website) (all together “**Services**”).

In this Privacy Policy, references to "**GDPR**" mean Regulation (EU) 2016/679 (General Data Protection Regulation).

### **2. Collection and Storage of Personal Data / Type and Purpose of their Use**

#### **2.1 When visiting the website**

##### **(a) Automated Collection**

When you visit our website ([www.parkplacetechnologies.com](http://www.parkplacetechnologies.com)), the browser on your device automatically sends information to the server on our website. This information is temporarily stored in a log file. The following information is recorded without your intervention and stored until it is automatically deleted (generally this data will be deleted after 7 days):

- IP address of the requesting device,
- Device identifier,
- Date and time of access,
- Name and URL of the retrieved file,
- Website from which access is made (referrer URL),
- The browser used and, if applicable, the operating system of your computer as well as the name of your access provider.

The above data will be processed by us for the legitimate interests set out below (Art. 6 para. 1 sentence 1 lit. f GDPR):

- To ensure a smooth connection of the website,
- To ensure comfortable use of our website,
- To evaluate system security and stability, and
- For other administrative purposes.

Under no circumstances do we use the data collected for the purpose of drawing conclusions about you personally.

In addition, we use cookies and other analysis tools (incl. tracking technologies) when you visit our website. You will find more detailed explanations under Sections 4 and 5 of this Privacy Policy.

(b) When requesting a quote

If you want to request a quote, we offer you the opportunity to contact us using a contact form provided on the website. Your name, the company's name and a valid e-mail address is required so that we know who sent the request and can respond to it. You can provide your phone number as further way of communication voluntarily.

The data will be processed in order to give you a quote. Our legal basis for this processing is so we can take the steps required in order to enter into any potential contract with you (Art. 6 para. 1 sentence 1 lit. b GDPR).

The personal data collected by us for the use of the contact form will be automatically deleted after your request has been processed.

(c) When using our chat live function/contact form

If you have any questions, we offer you the opportunity to contact us using the chat live function (or in case of non-availability a contact form) provided on the website. Your name, the company's name and a valid e-mail address is required as we have a legitimate interest to know who sent the request and to be able to respond to it (Art. 6 para. 1 sentence 1 lit. f GDPR). Further information such as the postcode can be provided voluntarily.

The personal data collected by us for the use of the contact form will be automatically deleted after your request has been processed.

(d) When posting or submitting user generated content

When you post or submit user generated content to us (via website or otherwise), we will only process such content in order to fulfil the intended purpose of such posting or submission.

Our legal basis for such processing is either to fulfil our contractual obligations (Art. 6 para. 1 sentence 1 lit. b GDPR); or to act in our legitimate interests, such as developing our products or services or to make our marketing more relevant to your interests (Art. 6 para. 1 sentence 1 lit. f GDPR).

Any such personal data will be deleted after the contractual obligation is finally fulfilled or your request has been completed.

Please note that by posting and submitting user generated content to public areas of the Services, this user generated content may be available to other customers and third-parties.

(e) When applying for a job vacancy

Our website further offers the opportunity to apply for job vacancies. This requires the provision of your name, e-mail address, resume data as well as the information on a current employment with us. Further information can be provided voluntarily.

The data will be processed merely for the purpose of your application. Our legal basis for processing such data is for the purposes of recruitment (Art. 88 GDPR), in conjunction with applicable national laws (such as Section 26 of the German Data Protection Act). In the absence of national laws, we need this data in order to enter into a contract of employment with you (Art. 6 para. 1 sentence 1 lit. b).

The personal data collected by us for the use of the contact form will be automatically deleted after the application process is finally closed. In case of employment your personal data will be stored for the duration of your employment.

Please note, we do not ask for, do not recommend, and you should not send us any special category of personal data, such as data related to your health, through our application tool.

2.2 When using our customer portal

(a) Automated Collection

Depending on the Service used (website/mobile app) the processing of your personal data is subject to the automated collection referred to in Sections 2.1(a) above.

## (b) Registration to the customer portal

When registering to the customer portal, we require your name, e-mail and account number as well as your company's name.

The personal data is processed in order to provide you with access to the customer portal and for us to therefore perform our contractual obligations to you (Art. 6 para. 1 sentence 1 lit. b GDPR).

## (c) Use of the customer portal

When using the customer portal, you can provide further personal data on a voluntarily basis. Such data may include account information, company contact personal data, or payment information.

You will further have access to other information that might include personal data such as your concluded contracts, scheduled assets or service tickets.

Such personal data is processed and provided to you in order to fulfil our obligations under the respective service agreement (Art. 6 para. 1 sentence 1 lit. b GDPR).

We retain your personal data for the duration of the service contract. The retention period might be longer in case other obligations oblige us to keep your data.

## 2.3 Consenting to advertisement and marketing activities

If you have expressly consented, or where permitted in our legitimate interest, we will use your e-mail address or other contact information to send you information on our products, events and other service related information (Art. 6 para. 1 sentence 1 lit. a and f. GDPR).

You can unsubscribe at any time, for example via a link at the end of each information e-mail. Alternatively, you can send your unsubscribe request at any time by e-mail to [reply@parkplacetech.com](mailto:reply@parkplacetech.com).

## 2.4 Use for corporate transactions

We may process (including transfer) the above personal data in connection with or during negotiations of any proposed or actual merger, purchase, sale, joint venture, or any other type of acquisition or business combination of all or any portion of Park Place Technologies, or transfer of all or a portion of Park Place Technologies' business to another company ("**Corporate Transaction**") for our legitimate interests (Art. 6 para. 1 sentence 1 lit. f GDPR). Our legitimate interest is to transfer our assets, including the personal data we hold, to such third party. Where appropriate, we will anonymize your personal data beforehand.

### **3. Transfer of Data**

Your personal data will not be transmitted to third parties for purposes other than those listed below.

We will only transfer your personal data to third parties if:

1. you have given your express consent (e.g. to our affiliates for advertising purposes) (Art. 6 para. 1 sentence 1 lit. a GDPR),
2. the disclosure is necessary to assert, exercise or defend legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data (Art. 6 para. 1 sentence 1 lit. f GDPR),
3. the disclosure is necessary in connection with or during negotiations of any proposed or actual merger, purchase, sale, joint venture, or any other type of acquisition or business combination of all or any portion of Park Place Technologies, or transfer of all or a portion of Park Place Technologies' business to another company (Art. 6 para. 1 sentence 1 lit. f GDPR),
4. in the event that a legal obligation exists for the transfer (Art. 6 para. 1 sentence 1 lit. c GDPR), and
5. this is legally permissible and is necessary for the processing of contractual relationships with you (e.g. agents vendors, consultants and other service providers (also as processors on behalf of us)) (Art. 6 para. 1 sentence 1 lit. b GDPR).

### **4. Cookies**

#### **4.1 General**

We use cookies with our services. These are small files that your browser automatically creates and that are stored on your device (laptop, tablet, smartphone, etc.) when you use our services. Cookies do no damage to your end device and do not contain viruses, Trojans or other malware.

Information is stored in the cookie that results in each case in connection with the specifically used terminal device. However, this does not mean that we immediately become aware of your identity.

The use of cookies serves on the one hand to make the use of our offer more pleasant for you. For example, we use so-called session cookies to recognize that you have already visited individual pages of our website. These will be deleted automatically after leaving our site.

In addition, we also use temporary cookies that are stored on your end device for a specified period of time to optimize user-friendliness. If you visit our site again to use our services, it will automatically recognize that you have already been with us and what entries and settings you have

made so that you do not have to enter them again.

On the other hand, we use cookies to statistically record the use of our website and to evaluate it for you for the purpose of optimising our offer (see Section 4.2). These cookies enable us to automatically recognize when you return to our site that you have already been with us. These cookies are automatically deleted after a defined period of time.

Your personal data collected through the cookies will be processed based on your prior explicit consent (Art. 6 para. 1 sentence 1 lit. a GDPR).

We use the services of OneTrust, LLC (London, UK). Our website is configured in a way to only allow the placement of cookies, if you accept their placement via our cookie banner. You have the option to accept all cookies or to decide for single cookies to be in place. You can revoke your consent by following the opt-out options described below or using the respective setting option provided by OneTrust.

This website uses the Google Tag Manager, a service provided by Google Inc. (<https://www.google.de/intl/de/about/>, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter "**Google**"). Google Tag Manager is a solution that allows us to manage our website tags and cookies through a single interface. The Google Tag Manager itself (which implements the tags) is a cookieless domain and does not collect any personal data. The tool triggers other tags and cookies, which may collect data. Google Tag Manager does not access this data. If cookies or tags have been deactivated (see below) at the domain or cookie level, it will remain in effect for all tags and cookies implemented with Google Tag Manager.

## 4.2 Cookie Overview

The following gives an overview on the cookies we use when visiting our website:

<b>Cookie Name</b>	<b>Description</b>	<b>Storage Time</b>	<b>Provider</b>
_dc_gtm_UA-#	Google Analytics cookie, used to distinguish users.	1 minute	third-party cookie
_ga	Google Analytics cookie, used to distinguish users.	24 months	third-party cookie
_gd#	Cookie to identify a specific session.	session	session cookie
_gid	Google Analytics cookie, used to distinguish users.	1 day	third-party cookie
__lc.visitor_id.#	Live Chat cookie, used to distinguish users.	34 months	third-party cookie
lc_sso#	Live Chat cookie, used to distinguish users.	34 months	third-party cookie
lc_window_state	Live Chat cookie, checks the chat window state (minimized/maximized)	session	third-party cookie

optimizelyBuckets	Optimizely cookie: (A/B testing) records the website variation that the visitor has seen for each test	10 years	third-party cookie
optimizelyEndUserId	Optimizely cookie, (A/B testing) used to distinguish users.	10 years	third-party cookie
optimizelySegments	Optimizely cookie, (A/B testing) persists the visitor's segments: browser, campaign, mobile source type	10 years	third-party cookie
ppt_source	Custom cookie by us, which keeps track of the marketing source you visit our site from and key pages that you visit after our site	1 month	temporary cookie
wc_client	Google Tag Manager; Container for all cookies.	7 months	third-party cookie
wp3011	Wordpress cookie for CM services.	1 year	third-party cookie

### 4.3 Analytical Cookies

The tracking measures listed below and used by us are carried out in our legitimate interests. With the tracking measures used, we want to ensure that our website is designed to meet requirements and is continually optimised. We also use the tracking measures to statistically record the use of our website and to evaluate it for the purpose of optimising our service (Art. 6 para. 1 sentence 1 lit. f GDPR).

Further details on the data we collect using analytical cookies see below.

#### (a) Google Analytics

To better understand and improve our website, we use Google Analytics, a web analysis service provided by Google. In this context, pseudonymized user profiles are created and cookies (see above) are used. The information generated by the cookie about your use of this website such as

- Browser type/version,
- operating system used,
- Referrer URL (the previously visited page),
- Host name of the accessing computer (IP address),
- Time of the server request,

are transferred to a Google server in the USA and stored there. The information is used to evaluate the use of the website, to compile reports on the website activities and to provide further services associated with the use of the website and the Internet for the purposes of market research and

demand-oriented design of these Internet pages. This information may also be transferred to third parties if this is required by law or if third parties process this data on behalf of the company. Under no circumstances will your IP address be merged with other data from Google. The IP addresses are anonymized so that an assignment is not possible.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=en>).

Further information on data protection in connection with Google Analytics can be found in the Google Analytics Help (<https://support.google.com/analytics/answer/6004245?hl=en>).

(b) Optimizely

This website uses Optimizely, a web analytics service provided by Optimizely, Inc. ("**Optimizely**"). Optimizely uses cookies, which are text files placed on your computer, to help to analyse how users use the site. The information generated by the cookie about your use of this website is usually transferred to an Optimizely server in the USA and stored there.

However, IP anonymization is activated on this website, and your IP address will be reduced by Optimizely within Member States of the European Union or in other countries party to the Agreement in the European Economic Area. Only in exceptional cases, the full IP address is transmitted to an Optimizely server in the USA and shortened there. Optimizely will use this information on behalf of the operator of this website to evaluate your use of the website and to compile reports on website activities.

The IP address transmitted by your browser within Optimizely will not be merged with other Optimizely data. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also deactivate Optimizely tracking at any time (and thus prevent Optimizely from collecting data generated by the cookie and relating to your use of the website - including your IP address - and processing of this data by Optimizely) by following the instructions at [http://www.optimizely.com/opt\\_out](http://www.optimizely.com/opt_out).

Further information on data protection in connection with Optimizely can be found under: <https://www.optimizely.com/privacy/>.

#### 4.4 Other Cookies

##### (a) Live Chat

This website uses LiveChat, a service from LiveChat, Inc. One International Place, Suite 1400, Boston, MA, USA (“LiveChat”).

LiveChat uses cookies to enable you to chat with us personally in real time. The information generated by the cookie about your use of this online service is generally transmitted to and stored by LiveChat, Inc. on a server in the USA. When using LiveChat, you can provide your name and e- mail address. In this case, this data will be stored by LiveChat, Inc.

The service is carried out in our legitimate interests, in order to enhance customer experience and offer you better contact possibilities (Art. 6 para. 1 sentence 1 lit. f GDPR). Cookies are placed based on your prior consent (Art. 6 para. 1 sentence 1 lit. a GDPR, see above).

For more information, please see LiveChat's privacy policy at <http://www.livechatinc.com/privacy-policy/>.

##### (b) AddToAny

This website uses AddToAny fields, a service provided by AddToAny ([www.addtoany.com](http://www.addtoany.com)); based in San Francisco, CA, USA). AddToAny allows you to bookmark or share interesting website content on the social web. The AddToAny service does not store any personal data according to their privacy policy. We also do not receive any data from AddToAny or data resulting from the use of the share buttons.

AddToAny also uses cookies in order to help deliver interest-based advertising based on browsing and sharing activity.

Further information on data processing and data protection by AddToAny can be found at [www.addtoany.com/privacy](http://www.addtoany.com/privacy).

#### 5. Web Beacons

Our website use software technology known as transparent GIF files (i.e. web beacons) to help us better manage content on our website by telling us what content is effective. Transparent GIF files are tiny graphics with a unique identifier that function similar to cookies and are used to track the online actions of Internet users. Unlike cookies stored on a user's computer hard disk, transparent GIF files are invisibly embedded in websites and are about the size of the dot at the end of this sentence. We may link the information collected by the transparent GIF files to our customers' personal information.

We use the web beacon of Act-On Software Inc. (8300 SW Creekside Place, Suite 250, Beaverton, Oregon, 97008 USA; “Act-On”). For further information on how Act-On uses the data collected, please refer to the relevant Act-On information under <https://www.act-on.com/privacy-policy/>.

The web beacon of Act-On is used for our legitimate interests in order to ensure that our website is designed to meet requirements and is continually optimised. We also use the web beacon to statistically record the use of our website and to evaluate it for the purpose of optimising our offers (Art. 6 para. 1 sentence 1 lit. f GDPR).

## **6. Social Media Plug-ins**

We use social plug-ins from the social networks Facebook, Twitter and Instagram on our website as part of our legitimate interests in order to make us more well-known (Art. 6 par. 1 p. 1 lit. f GDPR). The underlying advertising purpose is to be regarded as a legitimate interest within the meaning of the GDPR. Responsibility for data protection-compliant operations must be guaranteed by the respective provider.

### **6.1 Facebook**

Our website uses social media plugins from Facebook to personalize their use. For this we use the “share”-button. This is an offer from Facebook.

When you access a page of our website that contains such a plugin, your browser establishes a direct connection to the Facebook servers. The content of the plugin is transmitted directly from Facebook to your browser and integrated into the website.

By integrating the plugins, Facebook receives the information that your browser has called up the corresponding page of our website, even if you do not have a Facebook account or are not currently logged on to Facebook. This information (including your IP address) is transmitted directly from your browser to a Facebook server in the USA and stored there.

If you are logged in to Facebook, Facebook can directly associate your visit to our website with your Facebook account. If you interact with the plugins, for example by pressing the “share” button, the corresponding information is also transmitted directly to a Facebook server and stored there. The information is also published on Facebook and displayed to your Facebook friends.

Facebook may use this information for the purposes of advertising, market research and demand-oriented design of Facebook pages. To this end, Facebook creates usage, interest and relationship profiles (e.g. to evaluate your use of our website with regard to the advertisements displayed to you on Facebook), to inform other Facebook users about your activities on our website and to provide other services associated with the use of Facebook.

If you do not want Facebook to associate the information collected through our website with your Facebook account, you must log out of Facebook before visiting our website.

The purpose and scope of the data collection and the further processing and use of the data by Facebook as well as your rights and setting options for the protection of your privacy can be found in the data protection information (<https://www.facebook.com/about/privacy/>) on Facebook.

## 6.2 Twitter

Our website contains plugins from the short message network of Twitter Inc. (Twitter). You can recognize the Twitter plugins (“tweet button”) by the Twitter logo on our site. An overview on the tweet button can be found here (<https://about.twitter.com/resources/buttons>).

When you access a page on our website that contains such a plugin, a direct connection is established between your browser and the Twitter server. Twitter receives information that you have visited our site with your IP address. If you click the Twitter tweet button while logged into your Twitter account, you can link the contents of our pages on your Twitter profile. This allows Twitter to associate the visit of our pages with your user account. We would like to point out that, as the provider of the pages, we are not aware of the content of the data transmitted or how it is used by Twitter.

If you do not want Twitter to associate your visit to our pages, please log out of your Twitter account.

For more information, please see Twitter's privacy policy (<https://twitter.com/privacy>).

## 6.3 LinkedIn

Our website contains plugins of the career network of LinkedIn Corporation (LinkedIn). You can recognize the LinkedIn plugins (LinkedIn Widgets) by the LinkedIn logo on our site.

When you access a page on our website that contains such a plugin, a direct connection is established between your browser and the LinkedIn server. LinkedIn receives information that you have visited our site with your IP address. If you click the LinkedIn widget while logged into your LinkedIn account, you can link the contents of our pages on your LinkedIn profile. This allows LinkedIn to associate the visit of our pages with your user account. We would like to point out that, as the provider of the pages, we are not aware of the content of the data transmitted or how it is used by LinkedIn.

If you do not want LinkedIn to associate your visit to our pages, please log out of your LinkedIn account.

For more information, please see LinkedIn's privacy policy (<https://www.linkedin.com/legal/privacy-policy>).

## **7. Gravatar**

Our website uses the service Gravatar from Automattic, Inc. 132 Hawthorne Street San Francisco, CA 94107, USA.

Gravatar is a service where users can log in and store profile pictures and their e-mail addresses. If users leave contributions or comments with the respective e-mail address on other online presences (especially in blogs), their profile pictures can be displayed next to the contributions or comments. For this purpose, the e-mail address provided by the users is transmitted to Gravatar in encrypted form for the purpose of checking whether a profile has been saved for it. This is the sole purpose of the transmission of the e-mail address and it will not be used for other purposes, and will be deleted thereafter.

The Gravatar service is carried out in our legitimate interests, in order to enhance customer experience and personalization of our website (Art. 6 para. 1 sentence 1 lit. f GDPR).

By displaying the images, Gravatar obtains the IP address of the users, as this is necessary for communication between a browser and an online service. For more information on Gravatar's collection and use of the data, please refer to Automattic's privacy policy: <https://automattic.com/privacy/>.

If users do not want an image associated with their e-mail address to appear in Gravatar's comments, you should use a non-Gravatar e-mail address for commenting. We would also like to point out that it is also possible to use an anonymous or no e-mail address if users do not wish their own e-mail address to be sent to Gravatar. Users can completely prevent the transfer of data by not using our comment system.

## **8. Rights of the Persons Concerned (DataSubjects)**

You have the right:

1. to request information about your personal data processed by us. In particular, you may obtain information about the purposes of processing, the category of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned storage period, the existence of a right to rectification, deletion, restriction of processing or objection, the existence of a right of appeal, the origin of your data, if these have not been collected by us, and the existence of automated decision-making including profiling and, if applicable, the processing of your data, and require meaningful information on their details (Art. 15 GDPR);

2. to immediately request the correction of incorrect or complete personal data stored by us (Art. 16 GDPR);
3. to request the deletion of your personal data stored by us, unless the processing is necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest, or to assert, exercise, or defend legal claims (Art. 17 GDPR);
4. to restrict the processing of your personal data (for example while we verify or investigate your concerns with this information) (Art. 21 GDPR);
5. to receive your personal data in a structured, current and machine-readable format or to request its transfer to a third party (Art. 20 GDPR);
6. to withdraw your consent to us at any time and therefore object to any further processing of your personal data (Art. 7 para. 3 GDPR);
7. to object to the processing of your personal data pursuant to Art. 21 GDPR, including the right to object to marketing. Where the processing of your personal data is on the basis of our legitimate interests, you must provide reasons for this. If you would like to make use of your right of withdrawal or objection, simply send an e-mail to [reply@parkplacetech.com](mailto:reply@parkplacetech.com).
8. If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, (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) ) (Art. 77 GDPR).

## **9. Data Security**

We use suitable technical and organisational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction, or unauthorised access by third parties. Our security measures are continuously improved in line with technological developments.

## **10. Version and Amendment of this Privacy Policy**

This Privacy Policy is currently valid and has the status as of June 2018.

Due to the further development of our website and offers above or due to changed legal or official requirements, it may become necessary to change this data protection declaration. You can access and print out the current data protection declaration at any time on the website at <http://www.parkplacetechnologies.com/customer-service/privacy-policy/>.

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