



## Privacy Notice on Direct Marketing

At Park Place Technologies (Park Place Technologies, LLC, 5910 Landerbrook Drive, Mayfield Heights, OH 44124, USA) and all our subsidiaries, including Curvature LLC ("Park Place Technologies", "us", "we"), we are fully committed to the privacy of our customers. That's why we have drafted this Privacy Notice – so you can understand how seriously we take your privacy and the protection of your personal data.

By reading this Notice, you will be able to understand how we handle the contact data that we acquire directly from you and/or that we collect via acquisition from third-party providers and make informed choices about how we may process your personal data.

Please note that the processing of personal data for marketing purposes by means of cookies and other tracking technologies is addressed within our website privacy policy, available at the following link: <https://www.parkplacetechnologies.com/privacy-policy/>.

All personal data that we collect from third parties is treated in a lawful, fair, and transparent manner, based on Regulation (EU) 2016/679 ("GDPR"). We follow internationally recognized principles on this, such as the principles of purpose limitation, storage limitation, data minimization, data quality and confidentiality.

### 1. Data controller

We are a data controller of all personal data that is collected and processed by Park Place Technologies for marketing purposes.

For any questions related to this Privacy Notice, please contact: [dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com)

### 2. Personal data processed

We collect and process certain personal data relating to you, either when you provide such data to us, or through the use of third-party providers who specialize in providing marketing leads for Business-to-Business marketing (as better detailed in section 4, below). In particular, we process:

#### a. Name, contact details and other personal data

Park Place Technologies acquires contact details of business organizations and the executives and professionals who work for those organizations. We may acquire any or all of the following categories of personal information about you, past or current:

- Name;
- Company;
- Office Address;
- Telephone Number;
- Email Address;
- Job Title;
- Job Function and Responsibilities;
- Education;
- Social Media URL;

b. Special categories of personal data

It is important to mention that we do not process special categories of personal data for the purposes set out in this notice.

**3. Purposes of the processing and legal bases**

Why does Park Place Technologies process my personal data?

- Direct Marketing

- We use your personal data to send you information, offers and promotions related to Park Place Technologies services, as well as surveys concerning our services.
- We use your personal data in this way because we have a legitimate interest in promoting our services to our existing and potential customer base. You are not required to allow us to use your personal data for these purposes and you will not suffer any consequences if you choose not to do so (although you may not receive further marketing communications from us thereafter).
- We may contact you for the above purpose by means of e-mail or phone-calls with operator.

- Compliance

- When we collect your personal data, we may be required to store it for a certain amount of time, or report it to official authorities, because we are legally required to do so.
- This maybe the case, for example, when you opt-out from receiving marketing communications from us: in that case, we will retain only personal data strictly necessary to ensure that we do not contact you again in the future (in this case, under restricted conditions of use).
- We only handle your data in this manner where this is strictly necessary in order to comply with our legal obligations.

#### 4. Sources of personal data

We may collect personal data from third party providers who specialize in providing leads for Business to Business (B2B) marketing. In particular:

- DiscoverOrg Data, LLC ("ZoomInfo"), which privacy notice may be found at the following address: <https://www.zoominfo.com/about-zoominfo/privacy-policy>. More information on how ZoomInfo collects personal data may be found at the following link: <https://www.zoominfo.com/b2b/faqs/data/how-does-zoominfo-get-my-info>
- Lusha Systems, Inc. ("Lusha"), which privacy notice may be found at the following address: [https://www.lusha.com/legal/privacy\\_policy/](https://www.lusha.com/legal/privacy_policy/) You can also file an opt-out request directly to Lusha, by using the functions at the following link: <https://www.lusha.com/privacy-center/request-removal/>

#### 5. Recipients of personal data

Your personal data may be shared with the following people/entities ("Recipients"):

- People, companies, or firms that provide us with advice and consultancy concerning accounting, administrative, legal, tax, financial and debt collection matters in connection to our processing activities.
- Entities that help us carry out our processing activities, such as hosting providers and email platform providers.
- People we authorize to carry out technical maintenance (such as maintenance of network equipment and electronic communications networks).
- People we authorize to process personal data in order to perform activities that are related to the activities indicated in this Notice, like our employees. These people are under binding confidentiality obligations (either legal and/or contractual).
- Other companies within the Park Place Technologies Group.
- Public entities, bodies, or authorities with whom we share personal data, when strictly required by law (such as local tax, customs, or law enforcement authorities).

## 6. Transfers of personal data

Since we are a global Group with presence in many countries, your personal data may be transferred to recipients in multiple countries. We genuinely care about your privacy and for that reason we have implemented appropriate safeguards to protect your information when it is transferred. Some of these safeguards include adequacy decisions of the European Commission, standard data protection clauses adopted by the European Commission, or other safeguards or conditions that are considered adequate to the relative transfer of data.

## 7. Retention of personal data

### Retention for Marketing

#### Purposes

We will keep your data that we process for marketing until you unsubscribe or opt-out of such communications.

If you decide to opt-out, we will not use your data for marketing purposes anymore; however, we may need to keep it for longer if we have an existing business relationship with you, in order to protect ourselves from liability or as strictly necessary to ensure that we do not contact you again in the future (in this case, under restricted conditions of use).

### Retention for Compliance Purposes

We will keep data we process as long as required by the specific obligation or by the applicable law.

## 8. Data subjects'(your) rights

What are my rights, regarding my personal data?

As a data subject, you can exercise the following rights at any time:

- Access your personal data that we are processing (or receive a copy of those personal data) and obtain further information about such processing.
- Correct or modify your personal data that we are processing when it is inaccurate or incomplete.
- Request that we erase your personal data that we are processing, when you feel that the processing is unnecessary or unlawful.
- Request restriction of the processing of your personal data, when you feel that the personal data, we have on you is inaccurate, unnecessary or has been unlawfully processed, or when you have previously objected to its processing.

You can exercise any of the rights mentioned above by sending a written request to:  
[dataprivacy@parkplacetech.com](mailto:dataprivacy@parkplacetech.com)

You can also object to the processing of your personal data for Marketing, without needing to provide any justification for this, by selecting the appropriate link included at the bottom of marketing e-mail messages, or by sending a written request to the e-mail address indicated above.

As a data subject, you are entitled to file a complaint with the competent supervisory authorities for the protection of personal data, if you believe that the processing of your personal data carried out by us is unlawful.

## **9. Amendments**

This version of our Privacy Notice entered into force on 16<sup>th</sup> December 2021. We reserve the right to partly or fully amend this Privacy Notice, or simply to update its content, for example, as a result of changes in applicable law. We will inform you of any changes we deem important as soon as they are introduced (by sending out an e-mail to the contacts on our mailing lists, and by temporarily adding a pop-up banner to our website), and they will be binding as soon as they are published on our website.