# **Privacy Policy**

Digital Envoy, Inc. ("Digital Envoy") operates several business units, each of our business units has its own privacy policy to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information.

This privacy policy applies to <a href="https://www.digitalenvoy.com/">https://www.digitalenvoy.com/</a>.

For the privacy policy that relates to the Personal Information products of Outlogic, LLC, please click here.

For the privacy policy that relates to the Personal Information products of Matchbook Data LLC, please click <u>here</u>.

## **About us**

Digital Envoy is a trusted provider of IP geolocation, online authentication and related information to the e-commerce, entertainment, financial and marketing industries throughout the world. These services are delivered to the market via Digital Element and Digital Resolve, which are divisions of Digital Envoy. We apply our advanced, secure, data-driven technologies to our customers' information to help them promote their businesses, serve their customers, and protect against fraud and cyber security threats.

## What Personal Information do we collect?

The type of personal information that we will collect from you or that you voluntarily provide to us in connection with this website may include some or all of the following:

**Identity Information** includes first name, last name or similar identifier, title, street address.

**Contact Information** includes company email address, telephone numbers and job title, company name.

**Log Data** is automatically collected when you visit the website, and includes your internet protocol (IP) address, the URL of the requested webpage, browser type, version, and potentially the browser language, and the time and date of the request. This information does not identify you to us **unless** you have provided your name, contact information, or other identifying information as described above.

**Communications data** including emails, telephone calls and mail which you receive from us or send to us, and your preferences in receiving information and being contacted by us.

**Recruitment Data** – see Recruitment section below.

**Social Media Plugin Data** –including your IP Address and the URL for the webpage you are visiting on our website. See Social Media section below for more details.

The type of personal information that Digital Envoy will collect in connection with its products is the following:

**IP** addresses from publicly available **IP** address assignment rolls ("Publicly Available IPs"), associated with an imprecise geographic location estimate within a radius of no less than 1.1 kilometers, may be considered by some European jurisdictions in certain circumstances to be "personal data" within the meaning of the EU or the UK versions of the General Data Protection Regulation ("GDPR"). We collect and process this data on the basis of legitimate interests under GDPR.

# How do we use your Personal Information?

We may use your personal information in the following ways:

## To provide the features of the website and the services you request.

When you use our website, we will use your personal information to provide the requested product or service. For example, if you make an inquiry on our website, we will use the contact information you give us to communicate with you about the inquiry. If you contact our customer services, we will use information about you, such as inquiry or information about the service to help you resolve a problem or question.

#### To operate, improve and maintain our business, products, and services.

We use the personal information you provide to us to operate our business. We may use personal information about how you use our products and services to enhance your user experience, to help us diagnose technical, security, and service problems, and operate our website.

#### To protect our or others' rights, property, or safety.

We may also use personal data about how you use our website to prevent, detect, or investigate fraud, abuse, illegal use, violations of our Terms of Use, and to comply with court orders, governmental requests, or applicable law.

# To communicate information about our products, services, events and for other promotional purposes.

If you are an existing customer (for example, if you are a service user), we may use the contact details you provided to send you marketing communications about similar products or services, where permitted by applicable law (unless you have opted out).

#### To build our IP Intelligence products.

We may use Publicly Available IP Addresses to estimate their location within geographic areas having a radius of no less than 1.1 kilometers. This information may be used for fraud prevention, cybersecurity, advertising, and marketing purposes.

## **Other Information**

Non-identifying or de-identified information includes information collected from or about you that does not personally identify you. Digital Envoy treats IP addresses, log file information, user agent strings, computer IDs, and related information as non-identifying information, except if applicable law requires us to do otherwise. Digital Envoy may use non-identifying or de-identified information

for any purpose. To the extent that Digital Envoy combines non-identifying or de-identified information with your Personally Identifiable Information, Digital Envoy will treat the combined information as Personally Identifiable Information under this Privacy Policy.

# How might we share and disclose Your Personal Information?

We may share your personal information with other organizations in the following circumstances:

#### With our Service Providers

We have contracts with businesses that assist us with our own business operations (e.g., our Site, database hosting, fraud detection and prevention, verification and reporting, data hygiene, human resources, marketing and advertising, and email services), as well as billing or accounting functions, collections, technology, and other forms of operational support. Service Providers are limited to accessing and using Personal Information only as it is necessary to carry out their work for us.

## In relation to legal proceedings or process

We may share information we have collected when we have a legal obligation to do so. This may include compliance with a binding court order, exercising, establishing, or defending our legal rights or those of clients or any other third party, or in good faith to comply with the requirements of any applicable law or legal process.

Similarly, we may disclose any information we have collected as required to respond in good faith to legal process, including subpoenas (whether civil or criminal), court orders or search warrants.

## In relation to a corporate transaction

We may disclose information in connection with any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company.

## **With our Customers**

The estimated location of certain Publicly Available IP Addresses may be shared with our customers to support their own products and services (e.g. where such services are location specific or for fraud prevention purposes). The categories of customers who receive this data include:

- Companies involved in digital rights management (DRM), such as streaming media companies;
- Companies involved in fraud detection and payments, identity and access management, threat intelligence or cybersecurity;
- Companies involved in ad measurement, audience building and attribution for digital advertising technology (AdTech) or connected TV (CTV) advertising;
- Companies involved in iGaming compliance.

# How do we use your Personal Information for recruiting?

For the "Careers" tab we use a third-party provider, Paylocity, to maintain active job postings on our website, but do not allow them to use your information for other purposes outside of the application(s) you submit to us. Please see Paylocity's <u>privacy policy</u> for more information about their privacy practices.

To ensure transparency and inform candidates about the handling of personal information during the recruitment process, further details are listed below:

#### Information submission

Candidates' basic details, resumes, and application progress are accessible to Hiring Managers through the Paylocity system.

#### **Candidate review**

Hiring Managers can view submitted information, communicate with candidates, and manage the application process within the system.

### **Data security**

Candidate data is handled securely, and sensitive details are accessible only to authorized personnel for confidentiality.

## System features

Candidates' application progress and communication may be managed within the system by Hiring Managers. The system also permits actions such as inviting candidates, sharing candidate profiles with other Hiring Managers, correcting candidate information, and transferring candidates between job postings.

## Social media buttons

We use plugins on our website from social media networks such as, LinkedIn. You can recognise these plugins by their logos. Our plugins will not collect personal information about you unless you click on these logos. If you click on them, these plugins are activated and automatically transmit data to the plugin provider.

We do not have any influence over which data these providers collect from you. If you would like more information about their data processing, this can be found in the respective privacy policies on the websites of these providers.

## **Cookies**

We use cookies and similar techniques, such as tags/beacons and JavaScript's, which are small text files stored on your device. Using cookies is a way for us to make sure that our website is continuously improved, meets your needs and can be used as a tool to optimise our marketing strategy. For us to do this, we place functional cookies to make the website function as well as marketing cookies which help us target the right people and show them advertisements. Some of these cookies track your use of our website and visits to other websites and allow us to show you advertisements when you browse other websites.

Please view our **Cookie Policy** for more information on our use of cookies.

#### Children

Digital Envoy's website, products, and services are not targeted to children under 13. Digital Envoy does not knowingly collect information from children under 13, and we do not create marketing segments or knowingly enable advertising targeted to children under 18.

## **How long we keep Your Information**

We retain information collected through our websites, email and phone communications for as long as your account is active or as needed to provide you services. We also retain and use this information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Upon request we will provide you with information about whether we hold any of your personal information. If you have an account with us, you may access, correct, or request deletion of your personal information by logging in to your account or by contacting us at privacy@digitalenvoy.com. We will respond to your request within a reasonable timeframe.

We acknowledge that you have the right in certain jurisdictions to access any Personal Information you submit to us via the website or by email. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query to privacy @digitalenvoy.net.

## **Security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. Platforms, systems, and facilities in which personal information are processed are protected by secure network architectures that contain firewalls and intrusion detection devices.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Once we have received your information, we will use strict procedures and security features to prevent unauthorized access.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

# Your choices and access rights

#### Your choices regarding our use and disclosure of your Personal Information

To stop receiving email marketing communications message from us click "unsubscribe" at the bottom of an email from us. In addition, you may let us know as directed below.

We will not disclose your Personal Information to third parties if we have received and processed a request from you not to do so. To submit such a request, please contact us by email at privacy @digitalenvoy.net

#### **Your Cookie Choices**

You may adjust the privacy and security settings of your web browser, such as by using a Do Not Track preference (allaboutdnt.com) to change how your browser uses cookies.

You may go to our Cookie Policy at <a href="https://www.digitalenvoy.com/cookie-policy/">https://www.digitalenvoy.com/cookie-policy/</a> to view your current cookie consent status on this website. You may also click the black button in the left corner of the website to view and change your cookie consent options.

You can opt out of interest-based advertising served by companies that participate in the Digital Advertising Alliance's Consumer Choice tool by visiting http://aboutads.info/choices.

## **Your California Privacy Rights**

California Do-Not-Track Disclosure. At this time, the Site is not set up to honor web browser do-not-track settings.

Digital Envoy does not share Personally Identifiable Information with third parties for direct marketing purposes.

California customers may request information about our compliance with this law by contacting us by e-mail at privacy @digitalenvoy.com or by mail at the address set forth in below. Any such inquiry must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address.

If you are a user under 18 years of age and reside in California, you may request and obtain removal of, content or information that you have posted on our sites. You may send us any such requests by e-mail at privacy @digitalenvoy.net or by mail at the address set forth in below. We will review the request and respond promptly. You should be aware that a request to remove content or information posted by you on our sites does not ensure or require complete or comprehensive removal of such content or information from our databases.

## Disclosure for individuals in the European Union, the United Kingdom or Switzerland

This is a United States-based website and is subject to United States law. Laws related to personal information and privacy vary by country. For example, Personal Data collected in the European Union is subject to the European Union General Data Protection Regulation ("GDPR"). To comply with the GDPR, we provide the following information, which is specific to individuals located in the European Union, the United Kingdom or Switzerland.

"Personal Data" is defined by the GDPR and generally includes information that can be used to directly or indirectly identify an individual, such as names, addresses, cookie identifiers, mobile device identifiers and precise location data. A "controller" is an organization that processes Personal Data for its own purposes. The legal basis on which Digital Envoy, as a controller, processes your Personal Data will typically be your consent, our legitimate interests, performance of a contract or

compliance with legal obligations. To obtain your consent for website data, we rely on our own compliance steps, such as the cookie consent banner on the website.

We rely on legitimate interest when we use Personal Data to maintain the security of our services, such as to detect fraud or to ensure that bugs are detected and fixed. We also rely on legitimate interest when we use our own customers' data to communicate with them about our services or to analyze our own website activity.

When we conduct such cross-border transfers of Personal Data, we rely on the European Union Commission-approved Standard Contractual Clauses (SCCs). You may obtain a copy of our SCCs document by contacting us at privacy@digitalenvoy.net or the mailing address below in this section.

We also use legitimate interest to obtain and estimate the location of Publicly Available IP Addresses within a radius of no less than 1.1 kilometers and to provide such data to our customers. The relevant legitimate interests are the development and provision of our products and services, the operation of our business, and our customers interests in determining a location estimate for the purpose of providing their own products and services.

Because it is not possible for us to associate a Publicly Available IP Address with any individual, it is usually not possible to respond to individuals' requests regarding this type of data. However, for the Personal Data we may collect and process in connection with this website or your direct communication with us, you have the right to access, rectify, or erase any Personal Data we have collected about you through the services. You also have the right to data portability and the right to restrict or object to our processing of Personal Data we have collected about you through the services. To exercise your rights, contact us at privacy@digitalenvoy.net.

Contact Us at:

Digital Envoy Privacy
6525 The Corners Parkway NW

Suite 520

Peachtree Corners, GA 30092

or

privacy @digitalenvoy.net

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For EEA Residents: Please contact our EU Representative at eurep@digitalenvoy.net Alternatively, they can be reached by post (The DPO Centre, Alexandra House, 3 Ballsbridge Park, Dublin, D04C 7H2) or +353 1 631 9460. <a href="https://www.dpocentre.com/contact-us/">https://www.dpocentre.com/contact-us/</a>

For UK Residents, Please contact our UK Representative at ukrep@digitalenvoy.net . Alternatively, they can be reached by post (The DPO Centre Ltd, 50 Liverpool Street, London, EC2M 7PY) or +44 (0) 203 797 6340. <a href="https://www.dpocentre.com/contact-us/">https://www.dpocentre.com/contact-us/</a>

## **Privacy Policy Changes**

This Privacy Policy may be changed from time to time by us, in which case we will revise the date at the beginning of this Privacy Policy setting forth when it was last updated. We will post any Privacy Policy changes on this page and, if the changes are significant (also known as material changes), we will provide more prominent notice on this site prior to the changes becoming effective.

Last Updated: June 2024