

PRIVACY STATEMENT

At IRBUSINESS/IRBINC.COM, trust is our #1 value. This IRBUSINESS/IRBINC.COM Privacy Statement ("Privacy Statement") explains our privacy practices for the activities described herein. Please read this Privacy Statement carefully to learn how we collect, use, share, and otherwise process information relating to individuals ("Personal Data"), and to learn about your rights and choices regarding your Personal Data.

A reference to "IRBUSINESS/IRBINC.COM," "we," "us" or the "Company" is a reference to IRBUSINESS/IRBINC.COM.com, inc. and its relevant affiliate involved in the collection, use, sharing, or other processing of Personal Data.

1. Responsible Entity

IRBUSINESS/IRBINC.COM is the controller of your Personal Data as described in this Privacy Statement, unless specified otherwise.

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

For detailed privacy information related to a IRBUSINESS/IRBINC.COM customer or a customer affiliate who uses the IRBUSINESS/IRBINC.COM cloud products and services as the controller, please contact our customer directly. We are not responsible for the privacy or data security practices of our customers, which may differ from those explained in this Privacy Statement.

2. Processing activities covered

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

- Visit our websites that display or link to this Privacy Statement;
- Visit our offices;
- Receive communications from us, including emails, phone calls, texts or fax;
- Use our cloud products and services as an authorized user (for example, as an employee of one of our customers who provided you with access to our services) where we act as a controller of your Personal Data;
- Register for, attend or take part in our events, webinars, or contests; or
- Participate in community and open source development.

Processing of Personal Data is required for receiving certain products or services.

Our websites and services may contain links to other websites, applications, and services maintained by third parties. The information practices of other services, or of social media

platforms that host our branded social media pages, are governed by their privacy statements, which you should review to better understand their privacy practices.

3. What Personal Data do we collect?

3.1 Personal Data we collect directly from you

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

- If you express an interest in obtaining additional information about our services; request customer support (including accessing the Help & Training Portal); use our “Contact Us” or similar features; register to use our websites; sign up for an event, webinar or contest; or download certain content, we may require that you provide to us your contact information, such as your name, job title, company name, address, phone number, email address or username and password;
- If you make purchases via our websites or register for an event or webinar, we may require that you provide to us your financial and billing information, such as billing name and address, credit card number or bank account information;
- If you attend an event, we may, with your further consent, scan your attendee badge, which will provide to us your information, such as name, title, company name, address, country, phone number and email address;
- If you register for an online community that we host, we may ask you to provide a username, photo or other biographical information, such as your occupation, location, social media profiles, company name, areas of expertise and interests;
- If you interact with our websites or emails, we automatically collect information about your device and your usage of our websites or emails (such as Internet Protocol (IP) addresses or other identifiers, which may qualify as Personal Data (please see the “What device and usage data we process” section, below) using cookies, web beacons, or similar technologies;
- If you use and interact with our services, we automatically collect information about your device and your usage of our services through log files and other technologies, some of which may qualify as Personal Data (please see the “What device and usage data we process” section, below);
- If you communicate with us via a phone call from us, we may record that call;
- If you voluntarily submit certain information to our services, such as filling out a survey about your user experience, we collect the information you have provided as part of that request; and
- If you visit our offices, you may be required to register as a visitor and to provide your name, email address, phone number, company name and time and date of arrival. Additionally, due to the COVID-19 pandemic, you may be required to provide information regarding your health status, including your temperature, COVID-19-related symptoms, exposure to COVID-19 positive individuals, and recent travel history.

If you provide us or our service providers with any Personal Data relating to other individuals, you represent that you have the authority to do so, and where required, have obtained the

necessary consent, and acknowledge that it may be used in accordance with this Privacy Statement. If you believe that your Personal Data has been provided to us improperly, or want to exercise your rights relating to your Personal Data, please contact us by using the information in the “Contacting us” section below.

3.2 Personal Data we collect from other sources

We also collect information about you from other sources including third parties from whom we purchase Personal Data and from publicly available information. We may combine this information with Personal Data provided by you. This helps us update, expand, and analyze our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you. The Personal Data we collect from other sources includes identifiers, professional or employment-related information, education information, commercial information, visual information, internet activity information, and inferences about preferences and behaviors. In particular, we collect such Personal Data from the following sources:

- Third party providers of business contact information, including mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), IP addresses, social media profiles, LinkedIn URLs and custom profiles, for purposes of targeted advertising, delivering relevant email content, event promotion and profiling, determining eligibility and verifying contact information; and
- Another individual at your organization who may provide us with your business contact information for the purposes of obtaining services.

4. What device and usage data do we process?

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

4.1 Device and usage data

As is true of most websites, we gather certain information automatically when individual users visit our websites. This information may include identifiers, commercial information, and internet activity information such as IP address (or proxy server information), device and application information, identification numbers and features, location, browser type, plug-ins, integrations, Internet service provider, mobile carrier, the pages and files viewed, searches, referring website, app or ad, operating system, system configuration information, advertising and language preferences, date and time stamps associated with your usage, and frequency of visits to the websites. This information is used to analyze overall trends, help us provide and improve our websites, offer a tailored experience for website users, and secure and maintain our websites.

In addition, we gather certain information automatically as part of your use of our cloud products and services. This information may include identifiers, commercial information, and internet activity information such as IP address (or proxy server), mobile device number, device and application identification numbers, location, browser type, Internet service provider or mobile carrier, the pages and files viewed, website and webpage interactions including searches and other actions you take, operating system and system configuration information and date and time

stamps associated with your usage. This information is used to maintain the security of the services, to provide necessary functionality, to improve performance of the services, to assess and improve customer and user experience of the services, to review compliance with applicable usage terms, to identify future opportunities for development of the services, to assess capacity requirements, to identify customer opportunities, and for the security of IRBUSINESS/IRBINC.COM generally (in addition to the security of our products and services). Some of the device and usage data collected by the services, whether alone or in conjunction with other data, could be personally identifying to you. Please note that this device and usage data is primarily used to identify the uniqueness of each user logging on (as opposed to specific individuals), apart from where it is strictly required to identify an individual for security purposes or as required as part of our provision of the services to our customers.

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

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

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

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

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

4.6 Telephony log information

If you use certain features of our services on a mobile device, we may also collect telephony log information (like phone numbers, time and date of calls, duration of calls, SMS routing information and types of calls), device event information (such as crashes, system activity, hardware settings, browser language), and location information (through IP address, GPS, and other sensors that may, for example, provide us with information on nearby devices, Wi-Fi access points and cell towers).

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

We collect and process your Personal Data for the following purposes. Where required by law, we obtain your consent to use and process your Personal Data for these purposes. Otherwise, we

rely on another authorized legal basis (including but not limited to the (a) performance of a contract or (b) legitimate interest) to collect and process your Personal Data.

- Providing our websites and services (including necessary functionality for both): We process your Personal Data to perform our contract with you for the use of our websites and services and to fulfill our obligations under the applicable terms of use and service; if we have not entered into a contract with you, we base the processing of your Personal Data on our legitimate interest to operate and administer our websites and to provide you with content you access and request (e.g., to download content from our websites);
- Promoting the security of our websites and services: We process your Personal Data by tracking use of our websites and services, creating aggregated non-personal data, verifying accounts and activity, investigating suspicious activity, and enforcing our terms and policies to the extent it is necessary for our legitimate interest in promoting the safety and security of the services, systems and applications and in protecting our rights and the rights of others;
- Managing user registrations: If you have registered for an account with us, we process your Personal Data by managing your user account for the purpose of performing our contract with you according to applicable terms of service;
- Handling contact and user support requests: If you fill out a “Contact Me” web form or request user support, or if you contact us by other means including via a phone call, we process your Personal Data to perform our contract with you and to the extent it is necessary for our legitimate interest in fulfilling your requests and communicating with you;
- Managing event registrations and attendance: We process your Personal Data to plan and host events or webinars for which you have registered or that you attend, including sending related communications to you, to perform our contract with you;
- Managing contests or promotions: If you register for a contest or promotion, we process your Personal Data to perform our contract with you. Some contests or promotions have additional rules containing information about how we will process your Personal Data;
- Managing payments: If you have provided financial information to us, we process your Personal Data to verify that information and to collect payments to the extent that doing so is necessary to complete a transaction and perform our contract with you;
- Developing and improving our websites and services: We process your Personal Data to analyze trends and to track your usage of and interactions with our websites and services to the extent it is necessary for our legitimate interest in developing and improving our websites and services and providing our users with more relevant content and service offerings, or where we seek your valid consent;
- Assessing and improving user experience: We process device and usage data as described in Section 4.1 above, which in some cases may be associated with your Personal Data, to analyze trends and assess and improve the overall user experience to the extent it is necessary for our legitimate interest in developing and improving the service offering, or where we seek your valid consent;
- Reviewing compliance with applicable usage terms: We process your Personal Data to review compliance with the applicable usage terms in our customer’s contract to the extent that it is in our legitimate interest to ensure adherence to the relevant terms;
- Assessing capacity requirements: We process your Personal Data to assess the capacity requirements of our services the extent that it is in our legitimate interest to ensure that we are meeting the necessary capacity requirements of our service offering;

- Identifying customer opportunities: We process your Personal Data to assess new potential customer opportunities to the extent that it is in our legitimate interest to ensure that we are meeting the demands of our customers and their users' experiences;
- Registering office visitors: We process your Personal Data for security, health, and safety reasons, to register visitors to our offices and to manage non-disclosure agreements that visitors may be required to sign, to the extent such processing is necessary for our legitimate interest in protecting our offices, staff and visitors and our confidential information against unauthorized access;
- Recording phone calls: We may record phone calls for training, quality assurance, and administration purposes. If required under applicable law, we will obtain your prior consent or give you the option to object to a call being recorded;
- Displaying personalized advertisements and content: We process your Personal Data to conduct marketing research, advertise to you, provide personalized information about us on and off our websites and to provide other personalized content based upon your activities and interests to the extent it is necessary for our legitimate interest in advertising our websites or, where necessary, to the extent you have provided your prior consent (please see the "Your rights relating to your Personal Data" section, below, to learn how you can control how the processing of your Personal Data by IRBUSINESS/IRBINC.COM for personalized advertising purposes);
- Sending marketing communications: We will process your Personal Data or device and usage data, which in some cases may be associated with your Personal Data, to send you marketing information, product recommendations and other non-transactional communications (e.g., marketing newsletters, telemarketing calls, SMS, or push notifications) about us and our affiliates and partners, including information about our products, promotions or events as necessary for our legitimate interest in conducting direct marketing or to the extent you have provided your prior consent (please see the "Your rights relating to your Personal Data" section, below, to learn how you can control the processing of your Personal Data by IRBUSINESS/IRBINC.COM for marketing purposes); and
- Complying with legal obligations: We process your Personal Data when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Data to protect our rights or is necessary for our legitimate interest in protecting against misuse or abuse of our websites, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes, respond to lawful requests, or for auditing purposes.

If we need to collect and process Personal Data by law, or under a contract we have entered into with you, and you fail to provide the required Personal Data when requested, we may not be able to perform our contract with you.

6. Who do we share Personal Data with?

We may share your Personal Data as follows:

- Service Providers: With our contracted service providers, who provide services such as IT and system administration and hosting, credit card processing, research and analytics,

marketing, customer support and data enrichment for the purposes and pursuant to the legal bases described above;

- Affiliates: If you use our websites to register for an event or webinar organized by one of our affiliates, we may share your Personal Data with the affiliate to the extent this is required on the basis of the affiliate's contract with you to process your registration and ensure your participation in the event; in such instances, our affiliate will process the relevant Personal Data as a separate controller and will provide you with further information on the processing of your Personal Data, where required.
- Event Sponsors: If you attend an event or webinar organized by us, or download or access an asset on our website, we may share your Personal Data with sponsors of the event. If required by applicable law, you may consent to such sharing via the registration form or by allowing your attendee badge to be scanned at a sponsor booth. In these circumstances, your information will be subject to the sponsors' privacy statements. If you do not wish for your information to be shared, you may choose to not opt-in via event/webinar registration or elect to not have your badge scanned, or you can opt-out in accordance with Section 10 below;
- Customers With Whom You Are Affiliated: If you use our services as an authorized user, we may share your Personal Data with your affiliated customer responsible for your access to the services to the extent this is necessary for verifying accounts and activity, investigating suspicious activity, or enforcing our terms and policies;
- Contest and Promotion Sponsors: With sponsors of contests or promotions for which you register;
- Third party networks and websites: With third-party social media networks, advertising networks and websites, so that IRBUSINESS/IRBINC.COM can market and advertise on third party platforms and websites;
- Professional Advisers: In individual instances, we may share your Personal Data with professional advisers acting as service providers, processors, or joint controllers - who provide consultancy, banking, legal, insurance and accounting services, and to the extent we are legally obliged to share or have a legitimate interest in sharing your Personal Data;
- IRBUSINESS/IRBINC.COM Family Affiliates: With affiliates within the IRBUSINESS/IRBINC.COM corporate group and companies that we acquire in the future after they are made part of the IRBUSINESS/IRBINC.COM corporate group, to the extent such sharing of data is necessary to fulfill a request you have submitted via our websites or for customer support, marketing, technical operations and account management purposes; and
- Third Parties Involved in a Corporate Transaction: If we are involved in a merger, reorganization, dissolution or other fundamental corporate change, or sell a website or business unit, or if all or a portion of our business, assets or stock are acquired by a third party. In accordance with applicable laws, we will use reasonable efforts to notify you of any transfer of Personal Data to an unaffiliated third party.

We may also share anonymous or de-identified usage data with IRBUSINESS/IRBINC.COM's service providers for the purpose of helping IRBUSINESS/IRBINC.COM in such analysis and improvements. Additionally, IRBUSINESS/IRBINC.COM may share such anonymous or de-identified usage data on an aggregate basis in the normal course of operating our business; for

example, we may share information publicly to show trends about the general use of our services.

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

7. Children

Our websites are not directed at children. We do not knowingly collect Personal Data from children under the age of 16 unless (a) we have obtained consent from a parent or guardian, (b) such collection is subject to a separate agreement with us or (c) the visit by a child under the age of 16 is unsolicited or incidental. If you are a parent or guardian and believe your child has provided us with Personal Data without your consent, please contact us.

8. How long do we keep your Personal Data?

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

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

9. Your rights relating to your Personal Data

9.1 Your rights

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

- Access your Personal Data held by us;

- Know more about how we processed your Personal Data;

- Rectify inaccurate Personal Data and, taking into account the purpose of processing the Personal Data, ensure it is complete;

- Erase or delete your Personal Data (also referred to as the right to be forgotten), to the extent permitted by applicable data protection laws;

- Restrict our processing of your Personal Data, to the extent permitted by law;

- Transfer your Personal Data to another controller, to the extent possible (right to data portability);

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

Opt out of certain disclosures of your Personal Data to third parties;

If you're under the age of 16, opt in to certain disclosures of your Personal Data to third parties;

Not be discriminated against for exercising your rights described above;

Not be subject to a decision based solely on automated processing, including profiling, which produces legal effects ("Automated Decision-Making"). Automated Decision-Making currently does not take place on our websites or in our services; and

Withdraw your consent at any time (to the extent we base processing on consent), without affecting the lawfulness of the processing based on such consent before its withdrawal.

9.2 Your rights relating to customer data

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

10. How we secure your Personal Data

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

While we follow generally accepted standards to protect Personal Data, no method of storage or transmission is 100% secure. You are solely responsible for protecting your password, limiting access to your devices and signing out of websites after your sessions.

11. Changes to this Privacy Statement

We will update this Privacy Statement from time to time to reflect changes in our practices, technologies, legal requirements, and other factors. If we do, we will update the "effective date" at the top. If we make a material update, we may provide you with notice prior to the update taking effect, such as by posting a conspicuous notice on our website or by contacting you

directly, or where required under applicable law and feasible, seek your consent to these changes.

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

12. Additional Disclosures for California Residents

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

California law requires that we detail the categories of Personal Data that we disclose for certain “business purposes,” such as to service providers that assist us with securing our services or marketing our products, and to such other entities as described in Sections 5 and 6 of this Privacy Statement. We disclose the following categories of Personal Data for our business purposes:

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

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

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

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

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