# **Privacy Policy**

At Globality, Inc. (“Globality”), we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

Remember that your use of Globality's Services is at all times subject to our [Terms of Use](https://www.globality.com/terms-of-use), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

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## **What this Privacy Policy Covers**

Globality is business of connecting procurement and business users (“Globality Customers”) with those companies or entities that they select through the Globality platform for their sourcing needs (“Suppliers”). This Privacy Policy covers how we treat Personal Data that we gather when you, including our Suppliers, access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover how we treat Personal Data that we process as a processor or service provider when providing services to our Customers, or the practices of companies we don’t own or control or people we don’t manage.

## **Personal Data**

### *Categories of Personal Data We Collect*

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

|  |  |  |
| --- | --- | --- |
| **Category of Personal Data**  | **Examples of Personal Data We Collect** | **Categories of Third Parties With Whom We Share this Personal Data:** |
| **Profile or Contact Data** | * First and last name
* Email
* Phone number
* Profile photo
* Unique identifiers such as passwords
 | * Service Providers
* Globality Customers
 |
| **Device/IP Data** | * IP address
* Type of device/operating system/browser used to access the Services
 | * Service Providers
* Analytics Partners
* Advertising Partners
 |
| **Web Analytics** | * Web page interactions
* Referring webpage/source through which you accessed the Services
* Statistics associated with the interaction between device or browser and the Services
 | * Service Providers
* Analytics Partners
* Advertising Partners
 |
| **Professional or Employment-Related Data** | * Job title
* Employer
 | * Service Providers
* Globality Customers
 |
| **Geolocation Data** | * IP-address-based location information
 | * Service Providers
* Advertising Partners
 |
| **Other Identifying Information that You Voluntarily Choose to Provide** | * Identifying information in emails or letters you send us
 | * Service Providers
 |

### *Categories of Sources of Personal Data*

We collect Personal Data about you from the following categories of sources:

* **You**
	+ When you provide such information directly to us.
		- When you use our interactive tools and Services.
		- When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
		- When you send us an email or otherwise contact us.
	+ When you use the Services and such information is collected automatically.
		- Through Cookies (defined in the “Tracking Tools and Opt-Out” section below).
		- If you use a location-enabled browser, we may receive information about your location.
* **Public Records**
	+ From the government or other sources, including, in limited instances, publicly-available websites associated with our Suppliers.
* **Third Parties**
	+ Vendors
		- We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
		- We may use vendors to obtain information to generate leads and create user profiles.
	+ Advertising Partners
		- We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.

### *Our Commercial or Business Purposes for Collecting Personal Data*

* **Providing, Customizing and Improving the Services**
	+ Providing you with the products, services or information you request.
	+ Meeting or fulfilling the reason you provided the information to us.
	+ Providing support and assistance for the Services.
	+ Improving the Services, including testing, research, internal analytics and product development.
	+ Personalizing the Services, website content and communications based on your preferences.
	+ Doing fraud protection, security and debugging.
	+ Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).
* **Marketing the Services**
	+ Marketing and selling the Services.
* **Corresponding with You**
	+ Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Globality or the Services.
	+ Sending emails and other communications according to your preferences or that display content that we think will interest you.
* **Meeting Legal Requirements and Enforcing Legal Terms**
	+ Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
	+ Protecting the rights, property or safety of you, Globality or another party.
	+ Enforcing any agreements with you.
	+ Responding to claims that any posting or other content violates third-party rights.
	+ Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

## **How We Share Your Personal Data**

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Additionally, note that when you create a user account, your Profile Data may be visible to other users of the Services, such as employees of our Customers and Suppliers based on your user preferences and choices on the Platform.

* **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
	+ Hosting, technology and communication providers.
	+ Security and fraud prevention consultants.
	+ Support and customer service vendors.
	+ Product fulfillment and delivery providers.
* **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services.
* **Globality Customers.** Globality Customers use our Services to obtain information on prospective Suppliers. To this end, to provide our Services, we share Personal Data of, for example, employees of Suppliers on our platform.

### *Legal Obligations*

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

### *Data that is Not Personal Data*

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

## **Tracking Tools and Opt-Out**

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time. You can choose whether or not to accept Cookies through your internet browser’s settings.

We use the following types of Cookies:

* Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
* Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
* Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising.
* Retargeting/Advertising Cookies. Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled “Information about Interest-Based Advertisements.”

## **Data Security and Retention**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. Although we work to protect the security of your data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

## **Personal Data of Children**

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at DPO@globality.com.

## **California Resident Rights**

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at DPO@globality.com.

### *Access*

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

* The categories of Personal Data that we have collected about you.
* The categories of sources from which that Personal Data was collected.
* The business or commercial purpose for collecting or selling your Personal Data.
* The categories of third parties with whom we have shared your Personal Data.
* The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

### *Deletion*

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

### *Exercising Your Rights*

To exercise the rights described above, you must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We will work to respond to your Valid Request within 30 days of receipt.

You may submit a Valid Request using the following methods:

* Call us at: +1 (844) 257-0899
* Email us at: DPO@globality.com

Submit a form at this address: [Contact Page](https://www.globality.com/en-us/security-trust/contact#Contact)

### *Personal Data Sales Opt-Out and Opt-In*

We will not sell your Personal Data. To our knowledge, we do not sell the Personal Data of minors under 16 years of age.

### *We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA*

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA.

## **Other State Law Privacy Rights**

### *California Resident Rights*

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at DPO@globality.com

### *Nevada Resident Rights*

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at DPO@globality.com with the subject line “Nevada Do Not Sell Request” and providing us with your name. We will not sell your Personal Data. To our knowledge, we do not sell the Personal Data of minors under 16 years of age.

## **European Union Data Subject Rights**

### *EU Residents*

If you are a resident of the European Union (“EU”), United Kingdom, Lichtenstein, Norway or Iceland, you may have additional rights under the EU General Data Protection Regulation (the “GDPR”) with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Globality will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at DPO@globality.com. Note that we may also process Personal Data of our customers’ end users or employees in connection with our provision of certain services to customers, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

### *Personal Data We Collect*

The “Categories of Personal Data We Collect” section above details the Personal Data that we collect from you.

### *Personal Data Use and Processing Grounds*

The “Our Commercial or Business Purposes for Collecting Personal Data” section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

* Contractual Necessity: In some cases, we may process the following categories of Personal Data as a matter of “contractual necessity”, meaning that we need to process the data to perform under our Terms of Use with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
* Legitimate Interest: We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:
	+ Profile or Contact Data
	+ Professional or Employment Related Data
	+ Device/IP Data
	+ Web Analytics
	+ Geolocation Data
	+ Other Identifying Information that You Voluntarily Choose to Provide
	+ We may also de-identify or anonymize Personal Data to further our legitimate interests.

Examples of these legitimate interests include (as described in more detail above):

* + Providing, customizing and improving the Services.
	+ Marketing the Services.
	+ Corresponding with you.
	+ Meeting legal requirements and enforcing legal terms.
	+ Completing corporate transactions.
* Consent: In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
* Other Processing Grounds: From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

### *Sharing Personal Data*

The “How We Share Your Personal Data” section above details how we share your Personal Data with third parties.

### *EU Data Subject Rights*

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at DPO@globality.com. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

* **Access**: You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.
* **Rectification**: If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
* **Erasure**: You can request that we erase some or all of your Personal Data from our systems.
* **Withdrawal of Consent**: If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
* **Portability**: You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
* **Objection**: You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
* **Restriction of Processing**: You can ask us to restrict further processing of your Personal Data.
* **Right to File Complaint**: You have the right to lodge a complaint about Globality's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: <https://edpb.europa.eu/about-edpb/board/members_en>.

### *Transfers of Personal Data*

Transfers of Personal Data are governed by Data Protection Agreements between Globality and Globality Customers. In addition, Globality remains committed to the Principles of the EU-U.S. Privacy Shield Framework set forth by the U.S. Department of Commerce regarding the collection and use of Personal Data transferred from the EU. These Principles are (1) notice, (2) consent, (3) accountability for onward transfer, (4) security, (5) data integrity and purpose limitation, (6) access and (7) recourse, enforcement and liability with respect to all Personal Data received from within the EU in reliance on the Privacy Shield.

On July 16, 2020, the Court of Justice of the European Union issued a judgment in the *Schrems II* case invalidating the EU-U.S. Privacy Shield as a compliance mechanism for transfers of personal data from the EU to the U.S. The U.S. Department of Commerce has stated that it will continue to administer the Privacy Shield, and individuals can still file complaints with the Federal Trade Commission (FTC) and/or local supervisory authorities. The FTC can still enforce the Privacy Shield against current and former participating companies. We remain committed to our obligations under the Privacy Shield, and will continue to protect our customers’ data in accordance with those obligations. For more information about the Privacy Shield Program, please visit [www.privacyshield.gov](http://www.privacyshield.gov).

Please contact us at DPO@globality.com with any questions or concerns relating to the Privacy Shield. If your Personal data was transferred from the EU, UK, or Switzerland to the United States, and you are not satisfied with our response, Globality has agreed to participate in the dispute resolution procedures of the panel established by the EU data protection authorities (DPAs) to resolve disputes pursuant to the EU-US Privacy Shield Principles. A resident of the European Union, UK or Switzerland whose enquiry has not been satisfactorily addressed may contact either the EU DPA panel at <http://ec.europa.eu/justice/data-protection/bodies/authorities/third-countries/index_en.htm> or the Swiss FDPIC at <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/task.html> to resolve disputes pursuant to the EU-US and Swiss-US Privacy Shield Principles.

## **Changes to this Privacy Policy**

We constantly try to improve our Services, so we may change this Privacy Policy from time to time. Any update to Globality’s Privacy Notice will be reflected in this section. Please note that if you have opted not to receive legal notice emails from us (or you haven’t provided us your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding the notices.

Globality regularly reviews this Privacy Policy and publishes updates on this web page. This Privacy Policy was last updated on January 2022.

## **Contact Information**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

* Call us at: +1 (844) 257-0899
* Email us at: DPO@globality.com

Submit a form at this address: [Contact Page](https://www.globality.com/en-us/security-trust/contact#Contact)

If you are located in the European Union, you may use the following information to contact our Data Protection Officer and our European Union-Based Member Representative:

* VeraSafe has been appointed as Globality's representative in the European Union for data protection matters, pursuant to Article 27 of the General Data Protection Regulation of the European Union. If you are in the European Economic Area, VeraSafe can be contacted on matters related to the processing of personal data. To make such an inquiry, please contact VeraSafe using this contact form: <https://verasafe.com/public-resources/contact-data-protection-representative> or via telephone at: +420 228 881 031.
* Alternatively, VeraSafe can be contacted at: VeraSafe Plaza de la Solidaridad 12, Floor 5 29006, Malaga Malaga Spain