

Globality 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 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](#). 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 a business that connects 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 an identified or identifiable 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. In this Privacy Policy, our “Marketing Sites” means globality.com and our other public-facing marketing websites, and our “Platform” means the Glo platform and related services that we make available to Globality Customers and Suppliers under a subscription or platform services agreement. Where a practice described in this Privacy Policy applies only to the Marketing Sites or only to the Platform, we say so.

Personal Data

Residents of certain states have the right to obtain information regarding the categories of Personal Data we collect, sell, share, or disclose, the categories of sources of that data, the business purposes for which we collect it, how long we retain it, and the categories of entities to whom we disclose it. That information is provided in this section and the following section, “How We Disclose Your 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:

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Entities to Whom We Disclose this Personal Data:</u>	<u>Categories of Third Parties To Whom We Sell or Share this Personal Data:</u>
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Identifiers , such as Profile or Contact Data	• First and last name • Email • Phone number • Profile photo • Unique identifiers such as passwords	• Service Providers • Globality Customers	Not sold or shared
Internet or Other Electronic Network Activity Information , such as Device/IP Data and Web Analytics	• IP address • Type of device/operating system/browser used to access the Services • 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 and Advertising Partners (Marketing Sites only)	• Analytics Partners (Marketing Sites only) • Advertising Partners (Marketing Sites only)
Professional or Employment-Related Data	• Job title • Employer	• Service Providers • Globality Customers	Not sold or shared
Geolocation Data	• IP-address-based location information	• Service Providers • Globality Customers	Not sold or shared
Other Identifying Information that You Voluntarily Choose to Provide	• Identifying information in emails or letters you send us	• Service Providers	Not sold or shared

We determine the retention period for each of the categories of Personal Data listed above based on (1) the length of time we need to retain the information to achieve the business or commercial purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated investigation or litigation.

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.
 - Information we create or generate from information you provide or that we collect automatically. We infer new information from data we collect from you, including using automated means to generate information about your likely preferences or other characteristics (“inferences”). For example, we infer your general geographic location (such as city, state, and country) based on your IP address.
- **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 Processing Personal Data

- **Service functionality:** To provide you with our products and services, including to take steps to enter a contract for sale or for services, bill or invoice for services, process payments, fulfill orders, send service communications (including renewal reminders), and conduct general business operations, such as accounting, recordkeeping, and audits.
- **Service improvement:** To improve and grow our Services, including to develop new products and services and understand how our Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing.
- **Personalization:** To offer you recommendations and tailor the Services to your preferences.
- **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.

How We Disclose 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.** We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these business functions, which include:
 - *Supporting Service functionality*, such as vendors that support event registration, customer service and customer relationship management, subscription fulfillment, freight services, application development, list cleansing, postal mailings, and communications (email, fax).
 - *Auditing and accounting firms*, such as firms that help us create our financial records.
 - *Professional services consultants*, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
 - *Analytics and marketing services*, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
 - *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
 - *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
 - *Marketing vendors*, such as entities that support distribution of marketing emails.
- **Globality Customers.** Globality Customers use our Services to obtain information on prospective Suppliers. To this end, to provide our Services, we disclose Personal Data of, for example, employees of Suppliers on our platform.
- **Online Advertising Partners.** We partner with companies that assist us in advertising our Services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising.
- **Social Media Platforms.** If you interact with us on social media platforms, the platform may be able to collect information about you and your

interaction with us. If you interact with social media objects on our Services (for example, by clicking on a LinkedIn or Twitter “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.

- **Government Entities/Law Enforcement.** We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the health and safety of our employees, contractors, customers, or other individuals.
- **Other Businesses in the Context of a Commercial Transaction.** We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

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 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 disclose 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). Globality recognizes and honors the Global Privacy Control signal as

a valid request to opt out of the sale and sharing of Personal Data for U.S. residents. Please click on the link below to learn more about enabling the Global Privacy Control: <https://globalprivacycontrol.org/#download>. Globality also responds to “Do Not Track” signals for U.S. residents. You can choose whether or not to accept Cookies by default through your internet browser’s settings or you can adjust your cookie preferences at any time by clicking the link on the bottom of the webpage.

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 (e.g., Google Analytics) 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.
- Advertising Cookies. Advertising cookies are set by our advertising and analytics partners to recognize your browser across visits and across other sites, so we can build audience segments, deliver ads that match your interests, limit ad frequency, and measure the effectiveness of our campaigns. We use Advertising Cookies only on our Marketing Sites. We do not use Advertising Cookies on the Platform.

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 18 years of age; if you are a child under the age of 18, 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 18 years of age, we will delete that information as quickly as possible. If you believe that a child under 18 years of age may have provided Personal Data to us, please contact us at privacy@globality.com.

Special Information for Job Applicants

When you apply for a job with us, we may collect Personal Data from you, including:

- Personal Data you provide in connection with your application.
- Personal Data that you make available in your social media accounts.
- Personal Data about you that is available publicly.
- Personal Data that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully

prior to submitting your application materials. If you are a California resident, this section, together with the “Categories of Personal Data We Collect” and “Our Commercial or Business Purposes for Processing Personal Data” sections above, serves as our notice at collection for job applicants. We do not sell or share the Personal Data of job applicants.

California Resident Rights

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your U.S. Privacy 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 privacy@globality.com. Exceptions to these rights may apply.

California Consumer Privacy Act

The California Consumer Privacy Act (“CCPA”) provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, correct, delete, and limit disclosure of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights. If we collect personal information subject to the CCPA, that information, our practices, and your rights are described below.

Notice at Collection Regarding the Categories of Personal Information Collected

You have the right to receive notice of certain information about our data collection, use, and disclosure. The table in the “Categories of Personal Data We Collect” section above summarizes the categories of personal information we collect; the categories of sources of that information; whether we disclose, sell, or share that information to service providers or third parties, respectively; and the criteria we use to determine the retention period for such information. The categories we use to describe personal information are those enumerated in the CCPA. We collect this personal information for the purposes described above in “Our Commercial or Business Purposes for Processing Personal Data.” We do not collect or process sensitive personal information, as that term is defined in the CCPA, for any purpose that would require us to offer a right to limit its use and disclosure.

Access

You have the right to obtain information regarding the categories of Personal Data we collect, sell, share, or disclose. That information is provided in the “Personal Data” section above.

You also have the right to request access to the specific pieces of Personal Data Collected about you and information regarding the source of that Personal Data, the purposes for which we collect it, and the third parties and service providers to whom we sell or disclose it.

Deletion

You have the right to request that we delete the Personal Data that we have collected directly from you. 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.

Correction

You have the right to request that we correct the Personal Data that we have collected about you.

Personal Data Sales and Sharing Opt-Out and Opt-In

We engage in “sales” or “sharing” of Internet or Electronic Network Activity Information collected through our Marketing Sites, by means of the advertising and analytics cookies and similar technologies deployed on those sites. We do not use advertising cookies on the Platform, and we do not sell or share Personal Data collected through the Platform. Under the CCPA, a business “sells” Personal Data when it discloses Personal Data to a third party for monetary or other benefit. A business “shares” Personal Data when it discloses Personal Data to a third party for the purposes of cross-context behavioral advertising. A company may be considered a third party either because we disclose Personal Data to the company for something other than an enumerated business purpose under California law, or because its contract does not restrict it from using Personal Data for purposes unrelated to the service it provides to us.

You have the right to opt out of our sale or sharing of your Personal Data to third parties. To exercise this right, please visit our Do Not Sell or Share My Personal Data webpage or contact us. Your right to opt out does not apply to our disclosure of Personal Data to service providers. To our knowledge, we do not sell the Personal Data of minors under 18 years of age.

“Shine the Light” Law

California residents are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of Personal Data to third parties for their own direct marketing purposes. We do not share your Personal Data with third parties for those third parties’ direct marketing purposes.

Other State Law Privacy Rights

Residents of other states also have the following rights:

- *Opt out of “sales” of Personal Data and use of their Personal Data for “targeted advertising,”* as those terms are defined under applicable law.
- *Opt out of “profiling”* under certain circumstances, as defined under applicable law.

- *Confirm processing of and access to Personal Data* under certain circumstances.
- *Delete Personal Data* under certain circumstances.
- *Correct Personal Data* under certain circumstances.
- *Request list of specific third parties* (other than natural persons) to which Personal Data has been disclosed.

You may request to exercise these rights by contacting us using the “Exercising Your US Privacy Rights” instructions below. If we determine that you are a resident of a state that provides these rights, we will act on your request.

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. Currently we do not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please contact us at privacy@globality.com.

Exercising Your U.S. Privacy 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 the legally applicable timeline.

You may submit a Valid Request using the following methods:

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

Some states allow consumers, under certain circumstances, to authorize another individual or business, called an authorized agent, to make requests on your behalf.

Some states also give consumers the right to appeal a denial of their request. If you reside in a state that provides a right to appeal and we decline to act on your request, you may appeal by emailing privacy@globality.com with “Privacy Request Appeal” in the subject line, within the period stated in our response. We will respond to your appeal in writing within the period required by applicable law and will explain the reasons for our decision. If we deny your appeal, we will provide you with information about how to submit a complaint to your state Attorney General or other competent regulator.

European Union and UK Data Subject Rights

EU & UK 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”) or the U.K. equivalent 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 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 privacy@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:
 - 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. Where required by applicable law, we rely on your consent for the use of non-essential Cookies and similar technologies on our Marketing Sites and for marketing communications.

- 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.

Disclosing Personal Data

The “How We Disclose Your Personal Data” section above details how we disclose your Personal Data to third parties.

EU & UK 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 privacy@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.
- **Erase**: 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. If you are in the United Kingdom, you may also make a complaint to us directly by emailing privacy@globality.com. We will acknowledge your complaint within 30 days of receipt and will take appropriate steps to respond to it without undue delay.

Transfers of Personal Data

We may collect, process, and store your information in the United States and other countries. The laws in the United States regarding the handling of this information may be different from the laws of your country. Any such transfers will be governed by standard contractual clauses or other safeguards, as required by relevant law and which can be found in our [Data Processing Agreement](#), which is incorporated into this agreement and policy. Where Globality is the controller of your Personal Data, transfers from the European Economic Area, the United Kingdom or Switzerland to the United States are made under the European Commission's Standard Contractual Clauses and, for the United Kingdom, under the Information Commissioner's International Data Transfer Addendum or International Data Transfer Agreement. You may obtain a copy of the relevant safeguards by emailing privacy@globality.com.

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.

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: Privacy@globality.com

Submit a form at this address: [Contact Page](#)

If you are located in the European Union, you may use the following information to contact our European Union-Based and UK Member Representatives:

- EU Representative

Osano International Compliance Services Limited
ATTN: CMVO
3 Dublin Landings
North Wall Quay
Dublin 1
D01C4E0

- UK Representative

Osano UK Compliance LTD
ATTN: CMVO
42-46 Fountain Street
Belfast
Antrim
BT1 - 5EF

- Osano 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 and its counterpart under UK legislation. If you are in the European Economic Area or the UK, Osano can

be contacted on matters related to the processing of personal data. To make such an inquiry, please contact Osano using the above contact.

You may print a copy of this Privacy Policy by clicking [here](#).