

# Onvoy Communications, Ltd. GDPR & CCPA Online Privacy Notice

Effective Date: This Privacy Notice is effective on 3 May 2022.

Your privacy is important to Onvoy Communications, Ltd. (“OCL,” “we,” “us,” “our”). This Onvoy Communications, Ltd. GDPR & CCPA Online Privacy Notice (this “Privacy Notice”) describes the personal information (“Personal Data”) we collect about you, how we collect it, and how it is used, disclosed, transferred, retained and safeguarded, as well as the legal bases for processing it. It also describes your rights relating to the Personal Data we collect about you and how you can exercise those rights.

## Applicability of this Privacy Notice

This Privacy Notice applies to the Personal Data we collect as more specifically described in the section below entitled “Our Role with Respect to your Personal Data.” We collect this data through:

- The following web sites (collectively, the “Websites” or individually, a “Site”):
  - [www.inteliquent.com](http://www.inteliquent.com)
  - Inteliquent Careers Website
  - Inteliquent Customer Portal (“Customer Portal”)
  - Inteliquent API
  - Inteliquent Knowledge Base
  - Inteliquent Fax Portal
  - Connect West Portal (“Legacy”)
  - Wholesale Long Distance Portal
  - Customer Management Database Portal
  - Vitelity Customer Portal
  - UCaaS Customer Administration Portal
  - UCaaS Voice Management Portal
  - Community Portal (UCaaS Support)
  - Customer Management Center Portal
  - Customer Online Billing Portal
  - Bandwidth Utilization Graphs Portal
  - Atlas Partner Portal
  - Customer Admin Portal
  
- The following applications (collectively, the “Mobile and Desktop Apps”).
  - Connect
  - nCommand
  - nCommand Plus
  - officeXtend

- homeXtend

and

- Through interactions via telephone, email and other communication channels.

The use of Personal Data collected through our Websites, Applications, and via other means listed, shall be limited to the purpose of providing the service for which the OCL customer (“Customer”) has engaged OCL, and for our limited marketing purposes set out below.

If you have any questions regarding this Privacy Notice you may contact us as indicated in the “Contacting OCL” section below.

## **Our Role with Respect to your Personal Data**

Depending on the Personal Data which we process, OCL can be either a data controller (“controller”) (or a “business” as that term is used in some privacy laws like the CCPA) or a processor (or “service provider”). This Privacy Notice only applies where we are a controller. When OCL acts as a controller, we decide how and why Personal Data is collected and further processed. When we act as a processor (such as through the delivery of our services), we process Personal Data as directed by our Customers, when they use our services, and in these cases, we do not decide why and how that Personal Data will be processed. For example:

- For the Personal Data of our Customers as it relates to their business to business engagement with us, our business contacts and prospects, our marketing operations, the Personal Data of our Customers’ end users (or the end users of any other entity) which we retain and process outside of the scope of providing our Customers with our products and services in order to comply with our obligations set out in applicable law, as well as that of visitors to our Websites, we decide the purposes and means of processing, and consequently behave as a controller.
- When we process the Personal Data of our Customers’ end users (or the end users of any other entity) in order to provide our Customers with our products and services, we act as a processor or service provider on behalf of our Customers. Where you give your data to one of our Customers or where we collect your Personal Data on their behalf, our Customers’ respective privacy notices, rather than this Privacy Notice, will apply to our processing of your Personal Data. If you have a direct relationship with one of our Customers, please contact them to exercise your privacy rights.
- This Notice does not apply to the Personal Data of employees, job applicants, contractors, business owners, directors and officers of OCL.

## What Personal Data We Process and How We Obtain It

The table below describes the categories of Personal Data we have collected about you in the last twelve months when we act as a controller. The CCPA requires us to categorize the Personal Data we collect into a few groups, contained below:

The types of Personal Data users of our Websites and/or Mobile and Desktop Apps may submit include:

<b>Personal Data We Collect, Process, or Store</b>	<b>How We Obtain It</b>
<i>Data Category: Identifiers</i>	

<p><b>Via Call/ Message Detail Records (or Similar Communication Logs):</b> phone number of calling party/ message sender, phone number of called party/ message recipient, time and duration of call, time of message, message contents (from message logs if related to messaging), IP Addresses</p>	<p><b>Call/ Message Detail Records (or Similar Communication Logs):</b> We collect this Personal Data from our Customers' end users (and the end users of other entities) during the course of providing our products and services, and retain and process it as a controller where we do so outside of the scope of the provision of our products and services to our Customers.</p>
<p><b>Via Websites:</b> Name, email address, mailing address, phone number, username, account number, password, job title, company</p>	<p><b>Websites:</b> We collect this Personal Data from our Customers and prospects during the order process, registration for, and use of our services.</p>
<p><b>Via Desktop and Mobile Applications:</b> Name, email address, mailing address, or phone number, username, account number, password</p>	<p><b>Desktop and Mobile Applications:</b> We collect this Personal Data from our Customers through their use of our services Desktop and Mobile Applications.</p> <p><b>Interactions via telephone, email and other communication channels:</b></p>
<p><b>Via Log Files:</b> As is true of most websites, we gather certain information automatically</p>	<p><b>Log Files:</b></p> <p>This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site.</p>

<p><b>Via Tracking Technologies:</b></p> <p>OCL and its partners may use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Site or services. Please refer to our Cookie Statement within the Trust Center Menu above</p> <p><b>From Marketing:</b></p> <p>A real name, postal address, Internet Protocol address, email address, product interest, or other similar identifiers.</p>	<p><b>Tracking Technologies:</b></p> <p>The Customer Portal collects information under the direction of its Customers, and OCL has no direct relationship with the individuals whose personal data it processes. If you are a customer of one of our Customers and would no longer like to be contacted by one of our Customers that use our service, please contact the Customer that you interact with directly. As described more fully below, we may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our Customers.</p> <p><b>Marketing:</b> Cookies placed on our Websites and Desktop and Mobile Applications as described in our Cookie Statement; communication sent by you (as a Customer or prospect) via our Websites or by email; tradeshow/ conferences; publicly available websites (for example LinkedIn or industry websites); and vendors that provide website analytics and account-based marketing platform services.</p>
<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	<p>Through partners such as Google Analytics, Google Ads, LeadForensics, Salesforce Marketing Cloud, Hubspot, Bombora, Terminus, etc.</p>
<p><i>Data Category: Inferences drawn from other Personal Data</i></p>	

Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Through sources such as LinkedIn Ads
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**Cookies**

A “cookie” is a small file stored on your device that contains information about your device. We may use cookies to provide basic relevant ads, website functionality, authentication (session management), usage analytics (web analytics), and to remember your settings, and generally improve our websites and Services.

We use session and persistent cookies. Session cookies are deleted when you close your browser. Persistent cookies may remain even after you close your browser, but always have an expiration date. Most of the cookies placed on your device through our Services are first-party cookies, since they are placed directly by us. Other parties, such as Google, may also set their own (third-party) cookies through our Services. Please refer to the policies of these third parties to learn more about the way in which they collect and process information about you.

If you would prefer not to accept cookies, you can change the setup of your browser to reject all or some cookies. Note, if you reject certain cookies, you may not be able to use all of our services’ features. For more information, please visit <https://www.aboutcookies.org/>.

You may also set your browser to send a Do Not Track (DNT) signal. For more information, please visit <https://allaboutdnt.com/>. Please note that our Services do not have the capability to respond to “Do Not Track” signals received from web browsers.

For more information about our use of cookies, please see our cookie notice.

**Lawful Basis for Processing**

We must have a valid reason to use your Personal Data. This is called the “lawful basis for processing”. When we process Personal Data based on the instructions of our Customers, our Customers must determine the appropriate lawful basis for processing your Personal Data. To learn about their lawful bases for processing your Personal Data, please read the applicable privacy policy of your service provider.

When we determine why and how your Personal Data will be processed, we may process your Personal Data on the basis of:

- your consent;
- the need to perform a contract with you;
- our legitimate interests, such as our interest in marketing our services or efficiently managing our business and providing our services; and the interests of third parties which may access our services;

- the need to comply with applicable law, including the need to comply with a subpoena or other legal process; or
- any other reason, as required or permitted by law.

When we rely on legitimate interests as a lawful basis of processing, you have the right to ask us more about how we decided to choose this legal basis. To do so, please use the contact details provided in this Privacy Notice.

Where we process your Personal Data based on your consent, you may withdraw it at any time. However, this will not affect the lawfulness of our processing before you withdraw your consent. It will also not affect the validity of our processing of Personal Data performed under other lawful grounds.

### **How We Use the Information We Collect**

We use your Personal Data to:

- Send promotional materials, promotional merchandise or other marketing communications;
- Send you an order confirmation;
- Assess the needs of your business to determine suitable products;
- Send you requested product or service information;
- Respond to Customer service requests;
- Administer your account;
- Respond to your questions and concerns;
- Improve our website and marketing efforts;
- Conduct research and analysis;
- Display content based upon your interests;

We also use the information in other ways for which we provide specific notice at the time of collection. In addition, we use information collected through automated means for the purposes set forth above, including by (i) customizing users' visits to our Site, (ii) analyzing how users interact with our Websites, Applications and online advertisements; (iii) delivering targeted advertising and content tailored to our users' interests; and (iv) managing our Websites, Applications and other aspects of our business.

### **How Long We Keep Your Personal Data**

With respect to the data processing operations where we act as a controller, we will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required by law, for legal, tax or regulatory reasons, or other lawful legitimate purposes. We will also delete your Personal Data upon a verifiable request to delete the Personal Data.

Where we process Personal Data for marketing purposes or based solely on your consent, we process the information until you ask us to stop and for a short period after this (to allow us to implement your requests).

We also keep a record of any request you make asking us not to send you direct marketing solicitations or not to process your Personal Data for marketing purposes. We keep this record so that we can honor your request into the future.

With respect to Personal Data that we process on behalf of our Customers, we retain Personal Data for as long as instructed by the respective Customer (who typically acts as a controller) or as required by applicable law. Where a Customer requests the erasure of Personal Data, subject to applicable legal requirements, we will comply with such request within the periods described below.

Your Personal Data may need to be retained in our backup systems and will only be deleted or overwritten at a later time, which is normally within two weeks (subject to any legal obligations we may have). This retention may occur, even when you or a Supervisory Authority has validly asked us to delete your Personal Data or when we no longer have a legal basis for processing such Personal Data.

## **How We Share the Information We Collect**

### **Sharing With Third-Parties**

We may share your information with third-party business partners for the purpose of enhancing our products and services which we provide to you.

### **Sharing with Service Providers**

We share your information with third parties who provide services on our behalf to help us with our business activities. These companies are authorized to use your personal information only as necessary to provide these services to us. These services may include sending marketing communications or providing Customer service for OCL. To see the list of service providers to which we disclose Personal Data for our own personal business activities, and details thereof, please feel free to reach out to our privacy team at [Privacy@Inteliquent.com](mailto:Privacy@Inteliquent.com). We will provide a password to access the Third Party Processor/Sub-processor page on our Trust Center.

When you visit our websites, or as a Customer, use our services, certain third parties may collect Personal Data about your online activities over time and across different websites or online services. Please refer to the policies of these third parties to learn more about the way in which they collect and process information about you.

### **We do not sell your Personal Data to third parties.**

We do not sell your Personal Data. However, in connection with our services, we may transfer your Personal Data to third parties. Some of these third parties may be located outside of the jurisdiction



in which you are located. When the Personal Data is protected by data privacy laws, we will comply with the laws that govern such transfer. That means we may either ask for your explicit consent to transfer the Personal Data or require the third party to maintain at least the same level of privacy and security for your Personal Data that we do. We remain responsible for the protection of your Personal Data that we transfer to third parties as provided for by applicable data privacy laws.

Certain of these third parties may be located outside of the European Union or the European Economic Area. In some cases, the European Commission may have determined that a country's data protection laws provide a level of protection equivalent to European Union law. To see a list of the countries that the European Commission has recognized as providing an adequate level of protection to personal data, please refer to the [following site](#). We will only transfer your Personal Data to third parties in countries not recognized as providing an adequate level of protection to personal data when there are appropriate safeguards in place. These may include the European-Commission-approved standard contractual data protection clauses under Article 46.2 of the GDPR.

### **Other Disclosures of Your Personal Data**

We may disclose your Personal Data to the extent required by law, or if we have a good-faith belief that we need to disclose it in order to comply with official investigations or legal proceedings (whether initiated by governmental/law enforcement officials, or private parties). If we are required to disclose your Personal Data to governmental/law enforcement officials, we may not be able to ensure that those officials will maintain the privacy and security of your Personal Data.

We may also disclose your Personal Data if we sell or transfer all or some of our company's business interests, assets, or both, in connection with a corporate transaction. Finally, we may disclose your Personal Data to our subsidiaries or affiliates, but only if necessary for business purposes, as described in the section above.

We reserve the right to use, transfer, sell, and share aggregated, anonymized data for any legal purpose. Such data does not include any Personal Data. The purposes may include analyzing usage trends or seeking compatible advertisers, sponsors, and Customers.

### **Customer Proprietary Network Information ("CPNI")**

With respect to OCL's provision of telecommunications-related services for our Customers in the United States, on behalf of whom we act as a processor, OCL complies with the Federal Communications Commission's rules related to CPNI. In providing these telecommunications-related services for our Customers, which may include transmitting and routing voice calls, OCL protects the privacy and confidentiality of all CPNI, as required by United States' federal law.

### **Security**

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once

it is received. We have implemented administrative, technical and physical safeguards designed to protect the personal information you provide under this Privacy Notice against accidental, unlawful, or unauthorized destruction, loss, alteration, access or misuse. Some of those measures include encryption and redaction. We also have dedicated teams to look after information security and privacy.

OCL maintains an Information Security Management System program and is currently ISO27001:2013 certified over our security and confidentiality controls. This means OCL has established processes and practices against these controls that have been validated by an independent third party.

For an overview of our Information Security department and security by design efforts that we have implemented into OCL operations, please refer to the Security page, located at the top of our Trust Center menu. For further questions on data security, please feel free to reach out to our privacy team at [Privacy@Inteliquent.com](mailto:Privacy@Inteliquent.com). As necessary, we will then direct your questions to our internal Information Security department.

### **What Privacy Rights Do You Have?**

You have specific rights regarding your Personal Data collected and processed by us. Please note that you can only exercise these rights with respect to Personal Data that we process about you when we act as a controller or as a “business” under the CCPA. This is when OCL decides *why* and *how* your Personal Data will be processed, and not our Customers. To exercise your rights with respect to information processed by us on behalf of one of our Customers, please refer to the privacy notice of that specific Customer.

In this section, we first describe these specific rights and then we explain how you can exercise those rights.

#### **Right to Know What Happens to Your Personal Data**

This is called the “right to be informed”. It means that you have the right to obtain from us all information regarding our data processing activities that concern you, such as how we collect and use your Personal Data, how long we will keep it and who it will be shared with, among other things.

We are informing you of how we process your Personal Data with this Privacy Notice.

We will always try to inform you about how we process your Personal Data. However, if we do not collect the Personal Data directly from you, certain data privacy laws exempt us from the obligation to inform you (i) when providing the information is either impossible or unreasonably expensive; (ii) the gathering and/or transmission is required by law, or (iii) if the Personal Data must remain confidential due to professional secrecy or other statutory secrecy obligations.

#### **Right to Know What Personal Data We Have About You**

This is called the right of access. This right allows you to ask for full details regarding the Personal Data we have in our possession.

You have the right to obtain from us confirmation as to whether or not we process Personal Data concerning you, and, where that is the case, you have the right to obtain a copy or access to the Personal Data and certain related information.

Once we receive and confirm that you or your authorized agent made the request, we will disclose the following to you to the extent applicable:

- The categories of Personal Data we collected about you;
- The categories of sources for the Personal Data we collected about you;
- Our purposes of processing that Personal Data;
- Where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;
- The categories of third parties with whom we share that Personal Data;
- If we carry out automated decision-making, including profiling, as described in [Article 22\(1\) and \(4\) of the GDPR](#), meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you;
- The specific pieces of Personal Data we collected about you (this is also called a data portability request);
- If we disclosed your Personal Data for a business purpose, a list disclosing:
  - disclosures for a business purpose, identifying the Personal Data categories that each category of recipient obtained; and
- If we rely on legitimate interests as a lawful basis to process your Personal Data, the legitimate interests pursued by us or by a third party; and
- The appropriate safeguards for transferring data from the EU to a third country, if applicable.

Notwithstanding the above, please take into account that certain data privacy laws allow us not to satisfy your access request when:

- You already have the information;
- Providing such information proves impossible or would involve a disproportionate effort, or in so far providing such information is likely to render impossible or seriously impair the achievement of the objectives of that processing; and
- That Personal Data must remain confidential subject to an obligation of professional secrecy regulated by certain jurisdictions, including a statutory obligation of secrecy.

The CCPA does not allow us to disclose Social Security numbers, driver's license numbers or other government-issued identification numbers, financial account numbers, any health insurance or medical identification numbers, account passwords, or security questions and answers. If we have any of the foregoing, we can inform you generally that we possess it, but we may not provide the specific numbers, passwords etc. to you for security and legal reasons.

### **Right to Change Your Personal Data**

This is called the right to rectification. It gives you the right to ask us to correct without undue delay anything that you believe is wrong with the Personal Data we have on file about you, and to complete any incomplete Personal Data.

### **Right to Delete Your Personal Data**

This is called the right to erasure, right to deletion or the "right to be forgotten". This right means you can ask for your Personal Data to be deleted.

Please select the Data Subject Access Request link within the Trust Center menu selections, to proceed with processing of a request by our Privacy department.

Sometimes we can delete your information, but at other times we cannot. For example, in certain circumstances, applicable laws bar us from deleting your information. If that's the case, we will consider whether it is possible to limit how we use it.

### **Occasions Where We Cannot Fulfil a Deletion Request Under the GDPR or the CCPA**

The GDPR and the CCPA allow us to deny a request to erase your Personal Data if we or our service providers need to retain the Personal Data to:

- a) Complete the transaction for which we collected the Personal Data;
- b) Fulfill the terms of a written warranty or product recall conducted in accordance with federal law;
- c) Provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- d) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- e) Debug products to identify and repair errors that impair existing intended functionality;
- f) Exercise free speech, ensure the right of another consumer to exercise the consumer's free speech rights or exercise another right provided for by law;
- g) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- h) Enable solely internal uses reasonably aligned with your expectations based on your relationship with us;
- i) Comply with a legal obligation, including (but not limited to) obligations from the California Electronic Communications Privacy Act; or
- j) Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Right to Ask us to Change How We Process Your Personal Data**

This is called the right to restrict processing. It is the right to ask us to only use or store your Personal Data for certain purposes. You have this right in certain occasions, such as where you believe the

data is inaccurate or the processing activity is unlawful. This right enables you to ask us to suspend the usage of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.

### **Right to Ask Us to Stop Using Your Personal Data**

This is called the right to object. This is your right to tell us to stop using your Personal Data. You have this right where we rely on a legitimate interest of ours (or of a third party) to process your Personal Data. Also, you have the right to object at any time to the processing of your Personal Data for direct marketing purposes.

We will stop processing the relevant Personal Data unless: (i) we have compelling legitimate grounds for the processing that override your interests, rights, or freedoms; or (ii) we need to continue processing your Personal Data to establish, exercise, or defend a legal claim.

### **Right to Port or Move Your Personal Data**

This is called the right to data portability. It's the right to ask for and download Personal Data about you that you have given us or that you have generated by virtue of the use of our services, so that you can:

- Move it;
- Copy it;
- Keep it for yourself; or
- Transfer it to another organization.

We will provide your Personal Data in a structured, commonly used and machine-readable format. When you request electronically to know which data we have about you, we will provide you a copy in electronic format.

### **Right to Withdraw Your Consent**

Where we rely on your consent as the legal basis for processing your Personal Data, you may withdraw your consent at any time. If you withdraw your consent, our use of your Personal Data before you withdraw is still lawful.

If you have given consent for your details to be shared with a third party, and wish to withdraw this consent, please also contact the relevant third party in order to change your preferences.

### **Right Not to be Discriminated Against for Exercising your Privacy Rights**

We will not discriminate against you for exercising any of your privacy rights. Unless the applicable data protection laws permit it, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.

- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Right to Lodge a Complaint with a Supervisory Authority**

If the GDPR applies to the processing of your Personal Data with us, the GDPR grants individuals to lodge a complaint with a supervisory authority if you're not satisfied with how we process your Personal Data.

In particular, you can lodge a complaint in the Member State of the European Union of your habitual residence, place of work or of an alleged violation of the GDPR.

### **Response Timing and Format of Our Responses**

We will confirm the receipt of your request within ten (10) days, and in that communication, we will also describe our identity verification process (if needed) and when you should expect a response, except when we have already granted or denied the request.

Please allow us up to 30 days to reply to your requests from the day we received your request. If we need more time (up to 90 days in total), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will send our written response by mail or electronically, at your option.

Consider that we will only cover the twelve-month period preceding the moment we receive the request in any disclosures we provide you with.

If we cannot satisfy with a request, we will also explain why in our response. For data portability requests, we will choose a format to provide your Personal Data that is readily useable and should allow you to transmit the information from one entity to another entity without difficulty.

We typically will not charge a fee for processing or responding to your requests. In certain exceptional situations, we may charge a fee if we determine that your request is excessive, repetitive, or manifestly unfounded. In those cases, we will tell you why we made that determination and provide you with a cost estimate before completing your request.

### **Choice**

Social Media. Our Site includes social media features and widgets, such as Twitter, LinkedIn or Instagram buttons that run on our Site. These features and widgets may collect your IP address, which webpage you are visiting on our Site, and may set cookies to enable the feature and widget to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

## Changes to this Privacy Notice

We may update this Privacy Notice to reflect changes to our information practices. If we make any material changes, we will post the revised Privacy Notice to this Site. We will also update the “Effective” date. We will post a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## Contacting Us

If you have any questions or comments about this Privacy Notice or our processing of your Personal Data, please contact us at [privacy@inteliquent.com](mailto:privacy@inteliquent.com).

## European Union/ UK Representative

We have appointed [VeraSafe](#) as our representative in the EU/ UK for data protection matters. While you may contact us, VeraSafe can also be contacted on matters related to the processing of Personal Data. To contact VeraSafe, please use this contact form: <https://www.verasafe.com/privacy-services/contact-article-27-representative/> or via telephone at: [+420 228 881 031](tel:+420228881031).

Alternatively, VeraSafe can be contacted at:

### **VeraSafe Ireland Ltd. (for EU)**

Unit 3D North Point House  
North Point Business Park  
New Mallow Road  
Cork T23AT2P  
Ireland

### **VeraSafe United Kingdom Ltd. (for UK)**

37 Albert Embankment  
London SE1 7TL  
United Kingdom

## Data Protection Officer

We have appointed [VeraSafe](#) as our Data Protection Officer (DPO). While you may contact us directly, VeraSafe can also be contacted on matters related to the processing of Personal Data. VeraSafe’s contact details are:

## VeraSafe

100 M Street S.E., Suite 600  
Washington, D.C. 20003 USA  
Email: [experts@verasafe.com](mailto:experts@verasafe.com)

Web: <https://www.verasafe.com/about-verasafe/contact-us/>