

## Definitive's Privacy Notice

At Definitive, we understand that you need to know how data about you (i.e., personal data) is used. The Definitive Privacy Notice consists of the specific notices below which describe how we collect, use, and share personal data and explain your related rights and choices. "We" (or "Us") are Definitive Business Solutions, Inc. (including any relevant affiliates) and "You" may be a visitor to one of our websites, including <https://www.DefinitiveInc.com> and <https://www.DefinitiveChoice.com> ("Sites") or a user of our online services and applications and any related downloadable software ("Offerings").

### Specific Notices

The following notices describe our use of your personal data based on how we interact with you:

#### **1. General Privacy Notice**

This notice applies where we process personal data through our Sites, social media properties, through pre-contractual activities, during events, through surveys, or in any other interactions with you outside of your use of the Offerings.

##### **1.1. Personal Data We Collect**

We may collect personal data directly from you, from third parties or publicly available data, or automatically when you use the Sites through the use of technologies such as electronic communication protocols, cookies, widget buttons, or tools. We collect this personal data for the purposes outlined below in "How We Use Personal Data."

##### **1.2. How We Use Personal Data**

We will only use your personal data if we have a lawful basis to do so. Specifically, we use your personal data at your instruction or as follows:

- *Providing and Personalizing our Sites.* To operate and administer the Sites and to provide you with the content you choose to access or request; to tailor web content we display to you in order to offer location customization (e.g., setting a default language) and to otherwise personalize your experience using the Sites. We may use cookies and similar tracking technologies to automatically collect your personal data for this purpose (see our Cookie Notice).
- *Personalizing Events.* To tailor event invitations we send or display to you in order to offer location customization (e.g., local event offerings). We may use cookies and similar tracking technologies to automatically collect your personal data for this purpose (see our Cookie Notice).
- *Identifying Customer Opportunities.* To identify and assess potential new users through tools (e.g., LinkedIn Sales Navigator, DriftBot, ZoomInfo, etc.) and to engage with individuals responding to web content produced by Definitive or otherwise available on the Sites.
- *Sending Marketing Communications.* For direct marketing, promotional, and other non-transactional communications (e.g., newsletters, calls, SMS, or push notifications) in order to share information about special offers, promotions, and events or to otherwise contact you about Definitive products or information we think may interest you, in accordance with your marketing preferences.

- *Displaying, Measuring Personalized Advertisements.* To provide more relevant advertising to you on the Sites or third-party platforms, or to conduct related marketing research (e.g., by measuring the success of targeted advertising campaigns). We may use cookies and similar tracking technologies to automatically collect your personal data for this purpose (see our Cookie Notice).
- *Managing Event Registrations and Contests.* To plan and host events or webinars you have registered for or attend (including sending related communications to you), and to provide contests, promotions, and sweepstakes you have chosen to participate in or register for. Please note, contests may have additional rules relating to how we process your personal data.
- *Analytics and Improvement.* To better understand how you access and use the Sites and Offerings, and for other research and analytical purposes, such as to evaluate and improve the Sites and to develop additional services, content, and features (e.g., if you choose to participate in a survey or user-interface study, we may use your email address to reach out with follow-up questions or additional studies).
- *Protect Legal Rights and Prevent Misuse.* To protect the Sites, Offerings, and the rights of users and other individuals; to prevent unauthorized access and other misuse; and where we believe necessary to investigate, prevent, or act regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, or violations of our terms of use or this notice. We may use machine or deep learning technologies for these purposes (e.g., for fraud prevention or detection).
- *Comply with Legal Obligations.* To comply with the law or legal proceedings (e.g., we may disclose data in response to lawful requests by public authorities, including responding to national security or law enforcement requests).
- *General Business Operations.* Where necessary to the administration of our general business, accounting, recordkeeping, and legal functions.

### **1.3. How We Share Personal Data**

We will not sell your personal data to a third party or allow a third party to use the personal data we provide for its own marketing purposes. We may share information about you with your consent, at your request, or as follows:

- *To Our Service Providers.* We use third party service providers to process your personal data to assist us in business and technical operations. Definitive has data processing agreements with such service providers limiting their use of and access to personal data to specific purposes. They provide services relating, but not limited to fraud detection and prevention, billing, customer support, internet and connectivity, marketing (through direct mail, email, lead generation, etc.), event organizing, security, and user experience.
- *To Infrastructure Processors.* We use third parties for some of the infrastructure used to host content and personal data we process, including cloud providers. Definitive has data processing agreements with such service providers and their use of and access to personal data is limited to specific purposes.
- *To Affiliates.* We may share your personal data with our affiliates for our or our affiliates' internal business purposes (e.g., when you use or purchase an affiliate's services, when you apply to one of our global offices, etc.), marketing similar products (including lead generation and qualification purposes), or for other legal requirements. As Custom Audiences. We may share a hashed (scrambled) version of your email address, name, city, state, or similar information with advertising partners to assist us in reaching you with more relevant advertisements outside of the Sites (and to measure the success of such campaigns). These partners are not permitted to retain, use, or disclose

this information for their own third-party marketing purposes. If you would like to opt out of custom audiences, complete the contact form on our [contact us](#) page.

- ***As Required by Law.*** We may disclose information about you if we believe we must do so to comply with the law or a subpoena, bankruptcy proceeding, or similar legal process. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- ***To Protect Rights.*** We may disclose information about you, such as your name, contact information, and billing information, to enforce our agreements with you or to protect the rights and safety of Definitive, our customers, our users, and the general public, or as evidence in litigation in which we are involved.
- ***As Aggregate and Anonymized Information.*** We may share aggregate or anonymized information about you with our third-party service providers for our internal business purposes which may include marketing, advertising, research, or similar purposes.
- ***In a Business Transaction.*** If Definitive is involved in a dissolution, reorganization, financing, public offering of securities, merger, acquisition, or sale of all or a portion of its assets, your information may be transferred to providers, advisors, accountants, attorneys, the acquiring entity, or other third parties as part of the transaction (provided that we inform such individuals that they must use your personal data only for the purposes disclosed in this notice), and may also be reviewed as part of the due diligence review for the transaction (e.g., we may need to provide a list of all customer accounts and payment histories).

#### **1.4. Blogs; Forums; Testimonials**

Our Sites may contain publicly accessible blogs and interactive features. Any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your information from our blog or community forum, please contact us by completing our contact form on our [contact us](#) page. With your consent, we may publish testimonials you share with us, which could contain personal data such as your full name and other information you choose to share. Please note, information posted on these Sites may continue to be publicly available to others after termination or deactivation of your account with Definitive. If you wish to update or remove your testimonial, please fill out our contact form on our [contact us](#) page.

#### **1.5. Linked Sites; Third Party Widgets**

- ***Links to Other Websites.*** Our Sites may include links to other websites with privacy practices that may differ from ours. Any information you submit to a website not belonging to Definitive is governed by that site's privacy statement, not this one.
- ***Plugins and Social Media Widgets.*** Our Sites may include social media features and widgets ("**widgets**"), such as a "share this" button or other interactive mini programs. Widgets can be used to provide you specific services from other companies (e.g., displaying the news, opinions, music, etc.). Personal data such as your email address may be collected through widgets. Cookies may also be set by widgets to enable them to function properly. Widgets displayed on our Sites are not hosted by Definitive and are therefore subject to the privacy policies of the third-party company providing the widget rather than this notice.

## **2. Offerings Privacy Notice**

When you sign up for or use Offerings which we provide to you or, if you are an organizational user, to our customer with whom you have a relationship (e.g., employer/employee).

Purposes of Processing	Categories of Personal Data Collected for Each Purpose	Legal Basis for Processing
Provision of Services, or Customer Support.	<p><u>Directly from You:</u></p> <ul style="list-style-type: none"> <li>• your name, email address, physical address, phone number, and other similar contact information;</li> <li>• professional and organizational profile information, such as title, department, and company size/revenue;</li> <li>• payment information, including partial credit card number and billing address;</li> <li>• content of feedback, testimonials, inquiries, support requests, and any phone conversations, chat sessions and emails with or to us; and</li> <li>• your image (still or video), voice, and other identifiers that are personal to you when you use certain features on the Services.</li> </ul> <p><u>From Third Parties:</u></p> <ul style="list-style-type: none"> <li>• your employer may provide your email address in order to provision your account;</li> <li>• subscription, purchase, support, or other information about your interactions with products and services offered by us, our affiliates, or third parties (e.g., Smartsheet global resale partners) in relation to the Services;</li> <li>• providers of business contact information, including mailing addresses, job titles, email addresses, phone numbers, IP addresses, social media profiles, LinkedIn URLs and custom profiles;</li> <li>• payment information, including partial credit card and billing address from our payment processors;</li> <li>• usernames, aliases, and other authentication and security credential information from third party accounts, for example if you choose to use single sign-on services (e.g., Google OpenID, Skype, and Microsoft Single Sign-On); and</li> <li>• search results and links, including lead generation tools and paid listings.</li> </ul> <p><u>Automatically:</u></p> <ul style="list-style-type: none"> <li>• email addresses and phone numbers used to contact us;</li> <li>• authentication and security credential information;</li> <li>• the geo-location of your device or computer when using certain features in the Services; and</li> <li>• the clickstream through the Services (including date and time), performance data (e.g., page response times), download errors, and page interaction information (e.g., clicks)</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary to enter into or perform a contract with you (upon your request, or as necessary to make the Services available),</li> <li>• Establish, defend, or protect legal interests,</li> <li>• Compliance with law, or</li> <li>• Legitimate interests</li> </ul>

Purposes of Processing	Categories of Personal Data Collected for Each Purpose	Legal Basis for Processing
Customer Opportunities	<p><u>Directly from You:</u></p> <ul style="list-style-type: none"> <li>content of feedback, testimonials, inquiries, support requests, and any phone conversations, chat sessions and emails with or to us.</li> </ul> <p><u>From Third Parties:</u></p> <ul style="list-style-type: none"> <li>providers of business contact information, including mailing addresses, job titles, email addresses, phone numbers, IP addresses, social media profiles, LinkedIn URLs, and custom profiles.</li> </ul> <p><u>Automatically:</u></p> <ul style="list-style-type: none"> <li>network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider.</li> </ul>	Legitimate interests**, or with your consent
Personalization	<p><u>Directly from You:</u></p> <ul style="list-style-type: none"> <li>location information (e.g., from your language preference on the Sites or a provided address); and</li> <li>information about your professional profile and your organization, such as your title, and you organization size and revenue.</li> </ul> <p><u>From Third Parties:</u></p> <ul style="list-style-type: none"> <li>name, email address, physical address, phone number, and other similar contact information; and</li> <li>business contact information, including mailing addresses, job titles, email addresses, phone numbers, IP addresses, social media profiles, LinkedIn URLs and custom profiles.</li> </ul> <p><u>Automatically:</u></p> <ul style="list-style-type: none"> <li>identifiers and information contained in cookies and network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider.</li> </ul>	Legitimate interests**, or with your consent
Marketing	<p><u>Automatically:</u></p> <ul style="list-style-type: none"> <li>the clickstream through the Services (including date and time) page response times, download errors, and page interaction information (such as scrolling, clicks, and mouse-overs); and metrics, such as offering usage, occurrences of technical errors, diagnostic reports, your settings preferences, backup information, API calls, and other logs.</li> </ul>	Legitimate interests**, or with your consent

Purposes of Processing	Categories of Personal Data Collected for Each Purpose	Legal Basis for Processing
Analytics & Improvement	<p><u>Directly from You:</u></p> <ul style="list-style-type: none"> <li>information provided in support or bug tickets, such as name, email address, company.</li> </ul> <p><u>From Third Parties:</u></p> <ul style="list-style-type: none"> <li>location of devices, for example through IP look-up.</li> </ul> <p><u>Automatically:</u></p> <ul style="list-style-type: none"> <li>identifiers and information contained in cookies</li> <li>the clickstream through the Services (including date and time) page response times, download errors, and page interaction information (such as scrolling, clicks, and mouse-overs); and metrics, such as offering usage, occurrences of technical errors, diagnostic reports, your settings preferences, backup information, API calls, and other logs.</li> </ul>	Legitimate interests**, or with your consent
Protect Rights and Prevent Misuse, General Business Operations, or Comply with Legal Obligation.	<p><u>Directly from You:</u></p> <ul style="list-style-type: none"> <li>your name, email address, physical address, phone number, and other similar contact information.</li> </ul> <p><u>Automatically:</u></p> <ul style="list-style-type: none"> <li>network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider; and computer and device information, such as device, application, or browser type and version, browser plug-in type and version, operating system, or time zone setting.</li> </ul>	Compliance with a legal obligation, or Legitimate interests**.
<p><i>Legitimate interests**.</i></p> <p><i>With respect to each of the Purposes of Processing in the table above, we may collect personal data directly from you, your profile, or automatically, when you:</i></p> <ul style="list-style-type: none"> <li><i>purchase, sign up for, or log into the Offerings;</i></li> <li><i>configure or modify your personal settings;</i></li> <li><i>interact with or use the Offerings, including creating or modifying access permissions;</i></li> <li><i>communicate with us by phone, email, or other means to provision or otherwise service or support your account; and</i></li> <li><i>fill out a webform, questionnaire, or other information request to provision or otherwise service or support your account</i></li> </ul>		

**3. Cookie Notice**

This notice explains how we may use cookies, pixels, and similar tracking technologies to gather information about your use of, and automated interactions with, the Sites and Offerings - and your rights to control our use of them.

**3.1. What is a Cookie?**

- A cookie is a small text file that is placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners to make websites work (or work more efficiently) and to provide reporting information. Cookies allow a website to recognize your browser,

to store your preferences, and store other information related to you and your use of the website. This helps a website owner provide a personalized experience.

- Cookies can be “session cookies” or “persistent cookies.” A session cookie expires automatically when you close your browser; a persistent cookie will remain on your device until it expires, or you delete your cookies. Persistent cookies can be used to make tasks like logging into services easier for returning users by remembering a user's login information. Expiration dates are set in the cookies themselves; some may expire after a few minutes while others may expire after a few years. Cookies set by the website owner (in this case, Definitive) are called “first party cookies.” Cookies set by parties other than the website owner are called “third party cookies.” Third party cookies enable third party features or functionality to be provided on or through a website (e.g., interactive content, advertising, analytics, etc.). The company that sets third party cookies can recognize your computer both when it visits the company’s website and when it visits certain other websites. For more information on cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### **4. Candidate Privacy Notice**

When you apply for a job with Definitive, whether through one of our Sites or through a third-party service.

##### **4.1. Personal Data We Collect**

###### From You

Using third party service providers, acting on our behalf, we may collect the following types of information directly from you.

- Identification and contact details. This includes information such as your name, address, email address, phone number, and other contact information, as well as your gender, date of birth, nationality or nationalities, and national identifiers (for example, national ID, passport, or social security number).
- Employment history. This includes information about your previous employers and job titles.
- Background information. This includes information like your academic and professional qualifications, education, details included in your CV or résumé (some of which could include details about memberships or interests that reveal sensitive personal information about you), transcripts, and employment references.
- Reference information. This includes information about your professional references that you share with us (including their name, contact information, and job title, though it is your responsibility to get your references’ consent to share their personal information with us), information we receive from background checks (when we have them completed for a role), and information provided by other third parties.
- Previous applications and roles with us. This includes information about any prior applications you may have made for a position with us or any previous employment history with us.
- Your immigration or visa status. This includes information that would let us know if you are authorized or able to become authorized to work for one of our group companies.
- Other information you voluntarily provide. This includes information that you may provide throughout the recruitment process, including, for example, through assessment exercises and interviews.

If you fail to provide personal information requested by us which we consider to be necessary for us to consider your application, we may not be able to move forward with your recruitment process.

Unless permitted and necessary or required by law, there are certain types of information that we generally try to avoid collecting. For example, information that reveals race or ethnicity; religious,

political, or philosophical beliefs, or trade union membership; genetic or biometric data; information concerning your health/sex life; or criminal convictions or offenses ("**Sensitive Personal Data**"). We may collect some Sensitive Personal Data from you for legitimate recruitment and employment-related purposes, including meeting compliance obligations; providing accommodations for disabilities; equal opportunity monitoring; for anti-discrimination purposes; and to satisfy reporting obligations. In some countries and for some roles, we may need to conduct criminal background checks, but only where this is required or permitted by applicable laws. Separately, you may choose to voluntarily disclose Sensitive Personal Data during the recruitment process. If required by law, we will request your consent if we collect Sensitive Personal Data. In any case, any Sensitive Personal Data will be treated in strictest confidence and used only for the purposes of assessing your eligibility for employment or specific job duties with us.

#### From Third Parties

We may gather Personal Data about you from third parties, including:

- Professional references
- Background info provided or confirmed by academic institutions and training or certification providers
- Background checking agencies and other external database holders
- Recruitment or executive search agencies
- Publicly available sources, including social media such as LinkedIn or other information available online (as part of this, we may contact any mutual connections that are evident from publicly available information)

#### Automatically

We do not automatically gather personal data from our Site's [Career Opportunities](#) page, which is available for you to visit and search for open positions.

#### **4.2. How We Use Personal Data**

We rely on certain legal bases for the processing of personal data we collect under this notice. This includes our reliance on the principle that the processing is necessary for the purpose of the legitimate business interests. Where we rely on a legitimate business interest to process such information, we use the personal information in furtherance of legitimate business interests that include:

- *Registering Office Visitors.* To register visitors to our offices and to manage non-disclosure agreements that visitors may be required to sign, to protect Definitive's offices and confidential information against unauthorized access.
- *Protect Legal Rights and Prevent or Address Misconduct.* To protect Definitive employees and other individuals; prevent unauthorized access to Definitive; and where we believe necessary to investigate, prevent, or act regarding illegal activities, suspected fraud, or situations involving potential threats to the safety of any person.
- *Comply with Legal Obligations.* To comply with the law or legal proceedings; for example, we may disclose information in response to lawful requests by public authorities, including responding to national security or law enforcement disclosure requirements and providing information as required to comply with obligations of Definitive as a federal contractor.
- *Assessing Your Skills.* To assess your skills, qualifications, and suitability for the role which you have applied for, the role you are being considered for, or other relevant roles that are open or will be open in the future that might fit your skillset.



- *Communicate with You.* To communicate with you about the recruiting process, your candidacy for the position you applied for, respond to your enquiries and requests, and, if appropriate, about other potential positions or opportunities with us (including our affiliates).
  - *Improving the Recruitment Process.* To operate, evaluate, and improve the recruitment system, our application tracking, and recruitment activities, including but not limited to analyzing our hiring practices or trends; identifying qualification or skill shortages; and using information to match candidates and potential opportunities.
  - *General Business Operations.* Where necessary to the administration of our general business, accounting, recordkeeping, employment, and legal functions.

#### **4.3. How We Share Personal Data**

- *To Our Service Providers.* We use third party service providers to process your personal data to assist us in business and technical operations. Definitive has data processing agreements with such service providers limiting their use of and access to personal data to specific purposes. They provide services relating, but not limited to performing services on our behalf and only in accordance with our instructions, or to comply with legal requirements. For internship opportunities we may also use a third-party service provider to facilitate and manage the relationship between you and Definitive.
- *To Affiliates.* We may share your personal data with our affiliates for employment opportunities, positions, and for purposes otherwise described in this Privacy Notice.
- *As Required by Law.* We release information about you if we believe we must do so to comply with the law or a subpoena, bankruptcy proceeding, or similar legal process. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. For internship opportunities we may also be required to share your personal information with relevant educational entities to comply with applicable law (including labor laws) and regulations.
- *To Protect Rights.* We may disclose information about you, such as your name and contact information, to enforce our agreements with you or to protect the rights and safety of Definitive, our customers and users, and the general public, or as evidence in litigation in which we are involved.
- *In a Business Transaction.* If Definitive is involved in a merger, acquisition, or sale of all or a portion of its assets, your information may be transferred to the acquiring entity as part of the transaction (provided that we inform the buyer it must use your personal data only for the purposes disclosed in this notice), and may also be reviewed as part of the due diligence review for the transaction (e.g., we may need to provide a list of all customer accounts and payment histories). We may also disclose your personal information we collect and receive about you to providers, advisors, accountants, attorneys, and other third parties worldwide to the extent reasonably necessary to proceed with the negotiation or completion of a merger, acquisition, financing, public offering of securities, reorganization, or sale of all or a portion of our assets.

#### **5. Who We Are**

Definitive Business Solutions, Inc. is headquartered in Virginia. You can learn about us and our Offerings [here](#).

#### **6. Your Choices**

*Marketing Communications.* You can modify how we may contact you through email for marketing or promotional purposes at any time. This includes the choice to opt out of receiving emails from us for

marketing or promotional purposes altogether. To modify how we may contact you through email, follow the instructions provided in the marketing emails we send.

## **7. Your Rights**

You may have certain rights relating to your personal data under local data protection laws (e.g., the General Data Protection Regulation, the California Consumer Privacy Act, etc.) or based on your use of our Offerings. Such rights may include:

### **7.1. Access**

You can ask us to confirm if we are processing your personal data, provide you with details about such processing, and give you a copy of your personal data.

### **7.2. Erasure**

You can ask us to erase your personal data if certain conditions are met. We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary for compliance with a legal obligation or for the establishment, exercise, or defense of legal claims.

### **7.3. Objection**

You can object in writing to any processing of your personal data, which is done on the basis of our "legitimate interests," if you believe your fundamental rights and freedoms outweigh our legitimate interests. If you object in writing to our processing of your personal data, we shall then have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms. In addition, you can object to the processing of your personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing. We will then cease the processing of your personal data for direct marketing purposes.

### **7.4. Portability**

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another data controller, but only where our processing is based on your consent and the processing is carried out by automated means.

### **7.5. Rectification**

You can ask us to update or correct certain information; we may verify the accuracy of the data before rectifying it. For certain information you may be able to update or correct information by updating your personal setting within the Offerings.

### **7.6. Restriction**

You can ask us to restrict (i.e., keep but not use) your personal data, but only where: its accuracy is contested (see "Rectification" above), to allow us to verify its accuracy; the processing is unlawful, but you do not want it erased; it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise, or defend legal claims; or you have exercised the right to object, and verification of any overriding grounds is pending. We can continue to use your personal data following a request for restriction where we have your consent to establish, exercise, or defend legal claims, or to protect the rights of another.

### **7.7. Withdrawal of Consent**

You can withdraw your consent where processing is based on a consent you have previously provided. Your withdrawal of consent will not affect the lawfulness of the processing done prior to your withdrawal of consent taking effect. If you have questions about how to withdraw a consent you had provided, please complete our contact form on our [contact us](#) page.

## **7.8. Exercise of Rights**

To exercise your rights, please contact us by completing our contact form on our [contact us](#) page or using the contact details provided under the "How to Contact Us/Dispute Resolution" heading. We do not discriminate based on whether you choose to exercise your choices and rights and will not, based on your exercise of rights, deny the Offerings to you; charge you different rates (including through penalties or discounts/benefits); provide a different level or quality of Offerings; or suggest you may receive such different treatment. We will process any requests in accordance with applicable laws within a reasonable period of time. In order to properly process a request, we may need to verify your identity before taking any request-related actions.

## **8. Personal Data Retention**

We keep your personal data for as long as reasonably necessary for the purposes set out in our notices (see "How We Use Personal Data" in the applicable notice) or, if applicable, in accordance with the relevant terms in an agreement between you and Definitive. We will keep your personal data longer if required for tax or accounting purposes, to ensure we would be able to defend or raise a claim, to resolve disputes, enforce our contractual rights, or where we have a legitimate need - though we will generally not keep personal data for longer than seven years following the last date of communication with you. Where personal data is no longer required, we anonymize or dispose of it in a secure manner.

## **9. How We Protect Personal Data**

We are committed to implementing and maintaining reasonable and appropriate technical, physical, and administrative safeguards to protect your personal data. However, no company, including Definitive, can guarantee the absolute security of internet communications.

## **10. How We Dispose of Personal Data**

We are committed to properly disposing of personal data that is no longer required. Paper records containing personal and sensitive information will be shredded with a crosscut, diamond-cut or confetti-cut paper shredder. Digital records will be deleted. In recognition that deleting records only prevents access, but doesn't actually physically remove the data, we will use specialized software to permanently wipe the hard drive or physically destroy the hard drive(s) before recycling or selling your computer. This procedure will also be used for flash/thumb drives and portable hard drives. For smartphones and tablets, we will: 1) remove and physically destroy the memory and SIM cards (if present); or 2) Use the device settings and select the feature to master reset/wipe memory/erase all content and settings.

## **11. How We Respond to Your Inquiries**

By submitting an inquiry or access request to Definitive, you are entitled to receive:

- Confirmation that your personal information is being processed;
- A response within 30 calendar days;
- Access to that information;
- Definitive's lawful basis for processing;
- The names or categories of any third parties that the information has been shared with;
- The estimated period for which the personal data will be stored (or, if this hasn't yet been decided, the criteria used to determine that period);
- Any relevant information about how the personal data was obtained; and
- Information about automated decision-making, including profiling, and the reasoning for and potential consequences of the automation.

Definitive will not charge a fee for the information. Should Definitive deny access, we will document the reason(s) for our denial and inform you of your right to complain to our privacy counsel and seek legal advice.

#### **12. Children's Personal Data**

Our Sites are not directed toward children under 18 and we do not knowingly collect personal data from minors. If you are under 18, please do not use the Sites or Offerings or share personal data with us. If you learn that anyone younger than 18 has unlawfully provided us personal data, please [contact us](#).

#### **13. Recordkeeping of Authorized Disclosures**

Definitive will maintain records of all authorized disclosures. Records contain the following:

- data of the authorized disclosure
- contact details of the Definitive representative
- purpose for the disclosure
- categories of personal data that are processed
- existence of data belonging to minors
- retention period
- overview of security and technical data protection measures
- a list of categories of recipients of personal data
- any additional information, if deemed necessary

#### **14. Changes to This Notice**

We may amend, update, or revise this notice from time to time to reflect changes to our privacy practices, changing technologies, industry practices, regulatory requirements, or for other reasons. If we make any material changes that affect the way we treat your data, we will notify you by email, through the Sites or Offerings, or by other legally acceptable means. We encourage you to periodically review this notice for the latest information on our privacy practices.

#### **15. How to Contact Us**

You have the right to complain to a data protection authority about our collection and use of your personal data, but we encourage you to reach out to us first. Where processing is undertaken by our affiliated companies, they are joint controllers with Definitive Inc. for your personal data. The best way to reach us is by completing our contact form on our [contact us](#) page. Definitive's Privacy Counsel serves as Definitive's data protection contact and can be reached at:

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Webform: [Contact Form](#)

Email: [privacy@DefinitiveInc.com](mailto:privacy@DefinitiveInc.com)

Address:

Definitive Business Solutions, Inc.  
11921 Freedom Drive, Suite 500  
Reston VA 20190  
Attn: Legal / Privacy Office