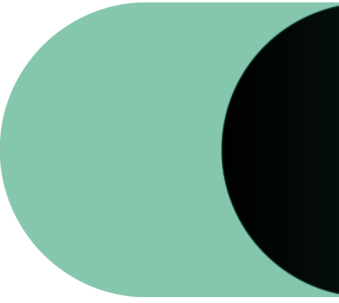




rimes

Global Privacy Notice

April 2025

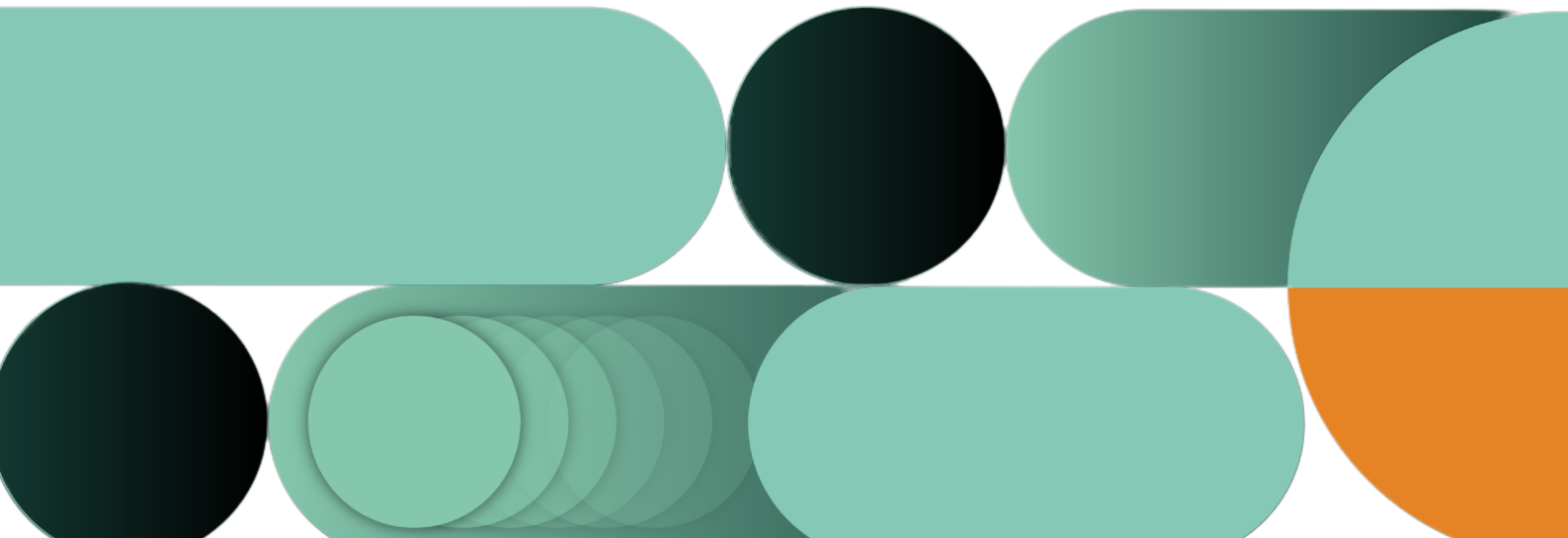


Table of Contents

Table of Contents	1
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Global Privacy Notice	5
------------------------------------	----------

1 PURPOSE OF THIS PRIVACY NOTICE	5
2 ABOUT US	6
3 HOW TO CONTACT US	6
4 WHAT PERSONAL DATA WE COLLECT	6
5 HOW WE COLLECT AND RECEIVE PERSONAL DATA	7
6 WHO WE COLLECT PERSONAL DATA ABOUT	7
7 HOW WE USE YOUR PERSONAL DATA	8
Use of our Site and Rimes Online.....	8
Fulfilment of our Services.	9
Customer service and enquiries.....	10
Insight, analysis and retargeting through Cookies.....	11
Advertising and marketing activities.....	12
Receipt of products and services from our suppliers.....	13
Security.	14
Business administration and legal compliance.	14
8 IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA	15
9 HOW WE OBTAIN YOUR CONSENT	15
10 THIRD-PARTY LINKS	15
11 SHARING PERSONAL DATA	16
12 TRANSFERS OUTSIDE THE UK AND THE EUROPEAN ECONOMIC AREA (“EEA”)	16
13 HOW LONG WE KEEP YOUR PERSONAL DATA	17
14 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA ...	18
15 PERSONAL DATA OF MINORS	18

16	YOUR RIGHTS AS A DATA SUBJECT	18
	US PRIVACY POLICY	21
I.	NOTICE AT COLLECTION OF PERSONAL DATA.....	21
1	DEFINITION OF PERSONAL DATA AND PROCESSING	21
2	CATEGORIES OF PERSONAL DATA WE COLLECT	21
3	OUR BUSINESS PURPOSES FOR COLLECTING AND PROCESSING PERSONAL DATA	22
	Use of our Site and Rimes Online.....	22
	Fulfilment of our Services.....	24
	Customer service and inquiries.....	25
	Insight, analysis and retargeting through Cookies.....	25
	Advertising and marketing activities.....	26
	Receipt of products and services from our suppliers.....	28
	Security.....	29
	Business administration and legal compliance.....	29

4	NOTICE OF RIGHT TO OPT OUT OF SALE/SHARING	30
5	HOW LONG WE KEEP YOUR PERSONAL DATA	31
II.	APPLICABILITY OF PRIVACY POLICY	32
6	PURPOSE OF THIS PRIVACY POLICY	32
7	NON-US RESIDENTS	32
8	THIRD-PARTY LINKS	32
III.	ADDITIONAL INFORMATION ABOUT OUR COLLECTION, PROCESSING AND SHARING OF YOUR PERSONAL DATA.....	33
9	SOURCES OF PERSONAL DATA	33
10	IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA	33
11	HOW WE OBTAIN YOUR CONSENT	34
12	WHO WE COLLECT PERSONAL DATA ABOUT.....	34
13	CATEGORIES OF THIRD PARTIES WITH WHOM WE SHARE PERSONAL DATA	34
14	OUR USES OF PERSONAL DATA IN THE LAST 12 MONTHS	35
IV.	YOUR PRIVACY RIGHTS AND CHOICES	39
15	NOTICE OF YOUR PERSONAL DATA RIGHTS	39
16	HOW TO EXERCISE YOUR PERSONAL DATA RIGHTS	41
V.	ADDITIONAL PRIVACY POLICIES AND PRACTICES.....	42
17	CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA	42
18	PERSONAL DATA OF MINORS	43
19	PERSONAL DATA OF OTHERS YOU SHARE WITH US.....	43
20	DO NOT TRACK	43
VI.	AMENDMENTS AND CONTACT INFORMATION	44
21	AMENDMENTS TO THIS PRIVACY POLICY	44
22	HOW TO CONTACT US	44
	Third Party Opt-Out Options.....	44

Google 45

LinkedIn 45

Third Party Opt-Out Options..... 45

Global Privacy Notice

This version is effective from: April 2025

This Global Privacy Notice (“**Privacy Notice**”) sets out how Rimes processes the personal data of individuals in the UK and all other countries other than the US (please see below for US Privacy Notice), in connection with our business, including the range of data based solutions we offer (the “**Services**”), and the provision of our website at <https://www.rimes.com> (“**Site**”). Throughout this Privacy Notice “Rimes” or “we”, “our”, or “us” means Rimes Technologies Limited, a company registered in England and Wales with company number 03855448 and registered office address at: 2 Seething Lane, London, England, EC3N 4AT.

We may update this Privacy Notice from time to time to reflect any changes or proposed changes to our use of your personal data, or to comply with changes in applicable law or regulatory requirements. We encourage you to review this Privacy Notice periodically to keep up to date on how we use your personal data. If we update this Privacy Notice, we will update the effective date at the top of the page.

Your access to and use of our Site is subject at all times to our [Website Terms of Use](#). If your organisation purchases Services from us, which may include use of a Rimes Online account, the purchase will be subject to the contractual terms agreed between your organisation and us from time to time.

1 PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice explains our approach to any personal data that we might collect from you or which we have obtained about you from a third party, and the purposes for which we process your personal data. This Privacy Notice also sets out your rights in respect of our processing of your personal data.

When we talk about “personal data”, we mean any information which relates to an identified or identifiable living individual. Individuals might be identified by reference to a name, an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them, such as their physical appearance.

This Privacy Notice is intended to assist you in making informed decisions when using our Site and our Services. Please take a moment to read and understand it. It should be read in conjunction with our [Website Terms of Use](#) and our [Cookie Policy](#).

This Privacy Notice only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data

collected by third parties during your communications with those third parties or your use of their products or services (for example, where you follow links to third party websites over which we have no control).

2 ABOUT US

The Site and our Services are made available by Rimes (see above for full company details).

3 HOW TO CONTACT US

If you have any questions about this Privacy Notice or want to exercise your rights as a data subject set out in this Privacy Notice, you can contact us using the following methods:

On Site	Contact us using our Contact Us form on the website linked here .
Email	Send us an email at: info@rimes.com
Post	Write to us at: FAO: Legal, 2 Seething Lane, London, England, EC3N 4AT.

4 WHAT PERSONAL DATA WE COLLECT

In providing our Site and our Services, we may collect and process different types of personal data about you for different processing purposes. The types of personal data we collect depends on who you are and how you use our Site and Services and includes the following:

Identity Data	First name; last name.
Contact Data	Business email address; telephone number, the information you choose to provide us with when you contact us using the Contact Us form on our Site (job title, company name, any information you choose to include in the free text field).
Rimes Online Registration Data	Permitted business email addresses, any other personal data that you may provide when you register an account with us.
Profile Data	Interests and preferences; contact preferences; feedback responses.
Behavioural Data	Data relating to your browsing activity on our Site or interaction with our emails, obtained through the use of cookies, pixel tags and other similar technologies; information about when your

	current or previous sessions started; details about any services you viewed through the Site.
Technical Data	IP address; browser type and operating system; geolocation, to ensure we're showing you the correct notices and information; any other unique numbers assigned to a device.
Marketing and Communications Data	Marketing preferences; service communication preferences.

5 HOW WE COLLECT AND RECEIVE PERSONAL DATA

We collect and receive personal data using different methods:

Personal data you provide to us	You may give us your personal data directly, for example, when you (or the organisation you represent) purchases our Services, when you contact us with enquiries, complete forms on our Site such as the Contact Us form, subscribe to receive our marketing communications or provide feedback to us.
Personal data we collect using cookies and other similar technologies	When you access and use our Site, we may collect certain Behavioural Data and Technical Data. We collect this personal data by using cookies and other similar technologies (see the "Insight, Analysis and Retargeting through Cookies" section below).
Personal data received from third parties	We may receive personal data about you from third parties. Such third parties may include marketing and analytics providers, and third parties that provide technical services to us so that we can provide our Site and our Services such as the hosting platform for our website.

6 WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

Site visitors	If you browse our Site, we will collect and process your personal data in connection with your interaction with us and our Site.
Individuals who access Rimes Online	If your company has purchased Rimes Online, we may collect and process personal data in connection with the supply of Rimes Online to your company and when you log into and use Rimes Online.
People who contact us with enquiries	If you contact us with an enquiry through our Site using our Contact Us form, or provide any feedback or opinions to us in any forms we will collect and process your personal data in connection with your interaction with us and our Site.

People who work for our customers and suppliers	If you work for one of our customers or suppliers and have responsibility for placing orders with us, administering your organisation's account with us or handling our orders or our account with your organisation, we will process your personal data in connection with your organisation's relationship with us.
Visitors to our physical locations	If you attend one of our offices, we may process personal data that you volunteer in connection with your visit and any enquiries you make. For example, you may volunteer personal data when signing in as a guest.

7 HOW WE USE YOUR PERSONAL DATA

We use your personal data for the purposes set out in this section. If we wish to make any changes to these purposes, or if we wish to use your personal data for any purpose that is not listed in this section, we will notify you using the contact details we hold for you.

Use of our Site and Rimes Online.

If you access Rimes Online	Your organization may have an account with us in order to provide you with access to Rimes Online. We will process your Rimes Online Registration Data in order to provide you with access. Once the account is registered, we may process your Identity Data, Rimes Online Registration Data and Profile Data to identify you when you log in to your Rimes Online account and access Rimes Online. We will also process certain Technical Data and Marketing and Communications Data so that we can administer your account and contact you about your account. We will also collect and process Behavioural Data and Technical Data when you use certain features and functionality on Rimes Online. This data helps us understand how you use Rimes Online so that we can improve it. <i>Our legal basis for processing</i> It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you (or the organization you represent), or it is in our legitimate interest to use personal data in such a way to ensure that we provide access to our Services in a secure and effective way and so that we can make improvements to our Services. You (or the organization which you represent) will consent to our processing of your personal data (or those of its
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	employees/representatives) when you or the organization you represent enters into a contract with us.
If you browse our Site	When you browse our Site, we may collect and process Behavioural Data and Technical Data to help us understand how you are using and navigating our Site. We do this so that we can better understand which parts of our Site are more or less popular and improve the structure and navigation of our Site. <i>Our legal basis for processing</i> It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you (or the organization you represent) for the Services, or it is in our legitimate interest to use personal data in such a way to ensure that we provide access to our Site in a secure and effective way and so that we can make improvements to our Site.
If you link to social media sites and interact with our social media pages	If you click on one of the social media links on our Site or otherwise interact with our social media pages such as on LinkedIn or Vimeo (including interacting with any 'like' or similar embedded features on our social media accounts), we and the relevant social media platform may receive information relating to such interaction and may share your personal data in connection with this purpose, such as certain Behavioural Data and Technical Data. For more information about how we use this personal data, please see the "Insight, analysis and retargeting through Cookies" section below. The relevant social media platform may also be a controller in respect of the personal data that is collected via your use of our social media pages and may use that personal data for additional purposes. For details of how the relevant social media platform uses your personal data, please see the privacy policy of the relevant social media platform. <i>Our legal basis for processing</i> It is in our legitimate interest to use personal data in the ways described above to ensure that we provide the Site in an effective way and to promote our Site via social media.

Fulfilment of our Services.

Fulfilment of our Services	We collect and maintain personal data that you submit to us for the purpose of supplying the range of data management and investment intelligence solutions we offer. We may collect
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	and process your personal data when you are interacting with us on behalf of any organisation you represent. The personal data we process may include your Identity Data and Contact Data (where applicable). We process this information so that we can comply with any regulatory checks we are obliged to perform, fulfil the supply of Services, maintain our user databases and to keep a record of how our Services are being used. If you attend one of our physical office locations, we will process personal data about you which you volunteer in connection with your visit and any enquiries you may have. This will usually include your Contact Data, and any other personal data you volunteer. Some Services we offer are also subject to separate terms and conditions which will also apply. <i>Our legal basis for processing</i> It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you and any laws we are subject to, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide the Services in an effective, safe and efficient way. If you provide such information to us via our "contact us" form, or in connection with any contract you consent to such processing of your personal data. You (or the organization which you represent) will consent to our processing of your personal data (or those of its employees/representatives) when you or the organization you represent enters into a contract with us.
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Customer service and enquiries.

If you have a general question or need help with any issue concerning our Site or our Services	There are various ways in which you are able to contact us (see the "How to contact us" section above). In particular, our Site features a "Contact Us" form, which invites you to submit general enquiries about our Site. From time to time, you may also be able to submit specific enquiries on other pages of our Site, including in secure account areas within Rimes Online. When you make an enquiry, we will collect and process your Identity Data, Contact Data and, if applicable, certain Profile Data, as well as any other personal data you volunteer that is relevant to your enquiry. If you have a technical issue concerning our Site, we may also collect and process
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	Behavioural Data and Technical Data to help us diagnose the technical issues you are experiencing and to help us resolve them in an efficient way. We use this information to manage and respond to your enquiry. <i>Our legal basis for processing</i> If you submit your personal data via the “Contact Us” form you consent to our processing your personal data in order to respond to your enquiry. It is in our legitimate interest to use your personal data in the ways described above to ensure that we are able to help you with your enquiry, provide a good standard of service and improve our customer services.
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Insight, analysis and retargeting through Cookies.

If we use cookies to help us understand more about you and your use of our Site and our Services	We and our third-party partners use cookies, web beacons, pixel tags and other similar technologies (which we generically refer to as “Cookies”) to collect data from the devices that you use to access our Site and Services and any marketing emails that you receive from us. The data that is collected includes Behavioural Data and Technical Data, and certain Profile Data. Please see our Cookie Preference Centre for further information, including details of our third-party partners. We and our third-party partners use this data to analyse how you use our Site and our Services and the effectiveness of our Site and our Services, including: • for the purposes described in the “If we carry out any online personalised advertising” section below; • to analyse how you use, and the effectiveness of, our Site and our Services; • to count users who have visited our Site or opened a marketing email and collect other types of information, including insights about visitor browsing habits, which helps us to improve our Site, and Services and the effectiveness of our emails; • to measure the effectiveness of our content; • to learn what parts of our Site are most attractive to our users, which parts of our Site are the most interesting and what kind of features and functionalities our visitors like to see; • to help us understand the type of marketing content that is most likely to appeal to our visitors and customers; and
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	to help us with the selection of future product and service lines, website design and to remember your preferences. <i>Our legal basis for processing</i> Where your data is collected through the use of non-essential cookies, we rely on consent to collect your personal data and for the onward processing purpose. Please see our Cookie Preference Centre for further details. In certain circumstances, we may rely on another lawful basis when we use your personal data collected via the use of cookies. For example, where we use personal data collected through the use of analytics cookies to analyse how you use our Site, it is in our legitimate interest to use your personal data in such a way to improve our Site and our Services.
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Advertising and marketing activities.

If we send you marketing communications by email	We use your Identity Data, Contact Data and Marketing and Communications Data to send you (or the organisation you represent) marketing communications by email. Our marketing will include press releases and information about us, our Site and our Services. Our marketing communications will include personalised and non-personalised marketing. Personalised marketing has been specifically tailored to you and will include content that we think is most relevant to you, based on what we know about you. Non-personalised marketing is marketing that is not tailored to you. Where we are sending you personalised marketing, we may also use Profile Data, and Behavioural Data to help us decide what sort of personalised marketing to send you (please see the “Insight, analysis and retargeting through Cookies” section above for more details). <i>Our legal basis for processing</i> It is in our legitimate interest to use your personal data for marketing purposes, for example to decide what marketing content we think may appeal to you. We rely on our legitimate interest to send marketing by email to business contacts of organisations who have purchased our Services. We may also rely on our legitimate interest to send marketing by email to certain business users of our Site and our Services.
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	When you submit your personal data via a "Contact Us" form you consent to our using such data to respond to your enquiry.
If we carry out any online personalised advertising	We and our third party partners may use your Profile Data, Behavioural Data and Technical Data and other data that is collected through your interactions with third party websites and services to provide you with, and analyse the effectiveness of, personalised ads when you visit other websites and/or use other services. By "personalised ads", we mean advertisements for products and services that you have shown an interest in when you have used our Site or which you otherwise might be interested in based on your browsing habits, although our third- party partners may use the data that is collected to show personalised ads for products and services offered by third parties. <i>Our legal basis for processing</i> Please see the "Insight, analysis and retargeting through Cookies" section above to learn about the legal basis that we rely on to collect data via the use of Cookies. Where we use your personal data to display online personal advertising to you, we rely on the consent that you have provided in respect of the collection of such data, or it is otherwise in our legitimate interests to promote our Site and and Services to you. Our third party partners may rely on a different lawful basis in respect of their use of your personal data. Please read the privacy policy of the relevant third-party provider, as set out in our Cookie Preference Centre.

Receipt of products and services from our suppliers.

If we have engaged you or the organisation you represent to provide us with products or services	If we have engaged you or the organisation you represent to provide us with products or services (for example, if you or the organisation you represent provide us with services such as IT support), we will collect and process your personal data in order to manage our relationship with you or the organisation you represent, to receive products and services from you or the organisation you represent, to comply with all legal and regulatory obligation we are subject to and, where relevant, to provide our Services to others. The personal data we collect from you may include your Identity Data and Contact Data and
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	any other personal data you volunteer which is relevant to our relationship with you or the organisation you represent. <i>Our legal basis for processing</i> It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or the organisation you represent, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with you or the organisation you represent and are able to receive the products and services that you or your organisation provides, and provide our Services to others, in an effective way.
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Security.

If we need to use your personal data in connection with the administration of our security measures	We have security measures in place at our premises, including building access controls. We may require visitors to our premises to sign in on arrival and where that is the case, we will keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need-to-know basis (e.g., to look into an incident). <i>Our legal basis for processing</i> It is in our legitimate interests to process your personal data so that we can keep our premises secure and provide a safe environment for our personnel and visitors to our premises.
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Business administration and legal compliance.

If we need to use your personal data to comply with our legal obligations or in connection with the administration of our business	We may use your personal data: (i) to comply with our legal obligations; (ii) to enforce our legal rights; (iii) to protect the rights of third parties; and (iv) in connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets. <i>Our legal basis for processing</i> Where we use your personal data in connection with a business transaction, to comply with our legal obligations (with local laws and regulations for example), to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply
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	with any legal obligations imposed upon us, such as a court order.
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8 IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA

Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you or your organisation. This may apply where you do not provide the personal data we need in order to provide the Services you have requested from us or to process an application to register an account. In these circumstances, we may have to cancel your application or the provision of the relevant Services to you, in which case we will notify you.

9 HOW WE OBTAIN YOUR CONSENT

Where our use of your personal data requires consent, you can provide such consent at the time we collect your personal data following the instructions provided, or by informing us using the contact details set out in the [“How to Contact Us”](#) section above.

10 THIRD-PARTY LINKS

This Privacy Notice only applies to personal data processed by us through your use of our Site and/or in connection with our business operations. However, from time to time, our Site may contain links to third-party websites and services. We have no control over these websites and services and this Privacy Notice does not apply to your interaction with the relevant third parties.

When you use a link to go from our Site to another website (even if you don’t leave our Site) or you request a service from a third party, your browsing and interactions on any other websites, or your dealings with any other third-party service provider, is subject to that website’s or third-party service provider’s own rules and policies. For example, our Site invites you to connect with us on social media platforms such as LinkedIn, Vimeo, Facebook and Twitter. When you click on the links we provide to such third-party platforms, you will be transferred from our Site to the relevant third-party platform and the privacy notice (and other terms and conditions) of that platform will apply to you.

We do not monitor, control or endorse the privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you use in connection with your interaction with us and to contact them if you have any questions about their respective privacy notices and practices.

11 SHARING PERSONAL DATA

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

When processing your personal data, we may need to share it with third parties (including other entities within our group of companies), as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.

Third-party suppliers who provide applications/ functionality, data processing or IT or other services	We share personal data with third parties who support us in providing our Site, our Business and help provide, run and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, sanctions checks, website design, hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them. We also share your personal data with third-party service providers to assist us with insight analytics. These providers are described in our Cookie Preference Centre .
Third-party post/email marketing and CRM specialists	We share personal data with specialist suppliers who assist us in managing our marketing database and sending out our post and email marketing communications and account-related communications.
Auditors, lawyers, accountants and other professional advisers	We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.

12 TRANSFERS OUTSIDE THE UK AND THE EUROPEAN ECONOMIC AREA (“EEA”)

Where necessary in order to provide our Site and our Services, we will transfer personal data to our other office locations within the Rimes group of companies including Rimes Technologies Corporation (a New York corporation), as well as to third-party processors engaged on our behalf (“Transferees”). Some of these Transferees are

located in countries outside the UK and the EEA. For example, we have offices located in the Australia and the USA.

Non-EEA/UK countries do not have the same data protection laws as the UK and the EEA. In particular, non-EEA countries may not provide the same degree of protection for your personal data, may not give you the same rights in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal data. However, when transferring your personal data outside the UK or the EEA, we will comply with our legal and regulatory obligations in relation to your personal data, including having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. We will take reasonable steps to ensure the security of your personal data in accordance with applicable data protection laws.

When transferring your personal data outside the UK or the EEA, we will, where required by applicable law, implement at least one of the safeguards set out below. Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data outside the UK or the EEA.

Adequacy decisions	We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission and/or the UK Government (as applicable).
Model clauses	Where we use certain service providers and when transferring to our group companies, we may use specific standard contractual clauses approved by the European Commission and/or the UK Government which give personal data the same protection it has in Europe and/or the UK.

13 HOW LONG WE KEEP YOUR PERSONAL DATA

In respect of personal data that we process in connection with the supply of our Services, we may retain your personal data for as long as we necessarily require it to satisfy our business requirements, and in compliance with our data protection obligations. We may then destroy such files without further notice or liability. We will retain your personal data in line with our Retention Policy. We have set out some guiding principles below:

- Where we process personal data in connection with the registration and use of an account on Rimes Online, we may retain your personal data for up to 7 years from the date that the relevant account is terminated (and in

compliance with our data protection obligations). We may then destroy such files without further notice or liability.

- Where we process any other personal data, we will retain relevant personal data for up to 7 years from the date of our last interaction with you (and in compliance with our data protect obligations). We may then destroy such files without further notice or liability.
- If any personal data is only useful for a short period (e.g., for a specific activity, promotion, or marketing campaign), we will not retain it for longer than the period for which it is used by us.
- If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future. However, we will not use this personal data to send you further marketing unless you subsequently opt back in to receive such marketing.

14 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA

We are committed to keeping the personal data you provide to us secure, and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e., those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of our Site, those who purchase our Services and our suppliers and their employees.

15 PERSONAL DATA OF MINORS

We do not process the personal data of data subjects who are 16 years old or younger. If we discover that we are holding the personal data of a minor, we will delete that information as soon as possible. Please contact us if you have reason to believe that a minor may have submitted personal data to us (see the [“How to contact us”](#) section above).

16 YOUR RIGHTS AS A DATA SUBJECT

You have certain rights in relation to the personal data we hold about you. These rights include the right: (i) to obtain copies of your personal data; (ii) to have your personal data corrected or deleted; (iii) to limit the way in which your personal data is used; (iv) to object to our use of your personal data; (v) to transfer your personal data; (vi) not to be subject to decisions based on automated processing (including profiling); and (vii)

to complain to a supervisory authority. If you would like to exercise any of these rights, please contact us using the details set out in the [“How to Contact Us”](#) section above.

Your right of access	If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.
Your right to rectification	If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we've shared your personal data with so that you can contact them.
Your right to erasure	You can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.
Your right to restrict processing	You can ask us to “block” or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
Your right to data portability	You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.
Your right to object	You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else's legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.

Your rights in relation to automated decision-making and profiling	You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us. We do not carry out automated decision making or profiling.
Your right to withdraw consent	If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact details in the "How to Contact Us" section above or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.
Your right to lodge a complaint with the supervisory authority	If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the "How to Contact Us" section above. You can also report any issues or concerns to a national supervisory authority in the EU Member State of your residence or the place of the alleged infringement. You can find a list of contact details for all EU supervisory authorities at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. As we are incorporated in the United Kingdom, our regulatory authority is the Information Commissioner's Office ("ICO"). Contact details for the ICO can be found on its website at https://ico.org.uk.

RIMES TECHNOLOGIES CORPORATION

US PRIVACY POLICY

Last Updated: July 2023

This US Privacy Policy ("**Privacy Policy**") sets out how Rimes processes the personal data of United States residents in connection with our business, including the range of data based solutions we offer, including Rimes Online (the "**Services**"), and the provision of our website at <https://www.rimes.com/> ("**Site**"). Throughout this Privacy Policy "**Rimes**" or "**we**", "**our**", or "**us**" means Rimes Technologies Corporation.

By accessing or using the Site or Services, or by providing personal data to us, you acknowledge that you accept our privacy practices and policies outlined below, and you consent that we may process personal data as described in this Privacy Policy, subject to the exercise of your rights as a data subject as described in this Privacy Policy.

I. NOTICE AT COLLECTION OF PERSONAL DATA

1 DEFINITION OF PERSONAL DATA AND PROCESSING

When we talk about "**personal data**", we mean any information which relates to an identified or identifiable living individual. Individuals might be identified by reference to a name, an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them, such as their physical appearance.

When we talk about "**process**", "**processes**", or "**processing**" of personal data, we any operation or set of operations performed, whether by manual or automated means, on personal data or on sets of personal data, such as the collection, use, storage, disclosure, analysis, deletion, or modification of personal data.

2 CATEGORIES OF PERSONAL DATA WE COLLECT

In providing our Site and our Services, we may collect and process different types of personal data about you for different processing purposes. The types of personal data we collect and process depends on who you are and how you use our Site and Services and includes the following:

Category of Data	Examples
Identity Data	First name; last name.
Contact Data	Business email address; telephone number, the information you choose to provide us with when you contact us using the Contact Us form on our Site (job title, company name, any information you choose to include in the free text field).
Rimes Online Registration Data	Permitted business email addresses, any other personal data that you may provide when you register an account with us.
Profile Data	Interests and preferences; contact preferences; feedback responses.
Behavioral Data	Data relating to your browsing activity on our Site or interaction with our emails, obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started; details about any services you viewed through the Site.
Technical Data	IP address; browser type and operating system; geolocation, to ensure we're showing you the correct notices and information; any other unique numbers assigned to a device.
Marketing and Communications Data	Marketing preferences; service communication preferences.

3 OUR BUSINESS PURPOSES FOR COLLECTING AND PROCESSING PERSONAL DATA

We collect and process your personal data for our business purposes and the business purposes of third parties as set out in this section. If we wish to make any changes to these purposes, or if we wish to use your personal data for any purpose that is not listed in this section, we will notify you using the contact details we hold for you.

USE OF OUR SITE AND RIMES ONLINE.

If you access Rimes Online	Your organization may have an account with us in order to provide you with access to Rimes Online. We will process your Rimes Online Registration Data in order to provide you with access. Once the account is registered, we may process your Identity Data, Rimes Online Registration Data and Profile Data to identify you when you log in to your Rimes Online account and access Rimes Online. We will also process certain Technical Data and
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	Marketing and Communications Data so that we can administer your account and contact you about your account. We will also collect and process Behavioral Data and Technical Data when you use certain features and functionality on Rimes Online. This data helps us understand how you use Rimes Online so that we can improve it. <i>Our legal basis for processing</i> It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you (or the organization you represent), or it is in our legitimate interest to use personal data in such a way to ensure that we provide access to our Services in a secure and effective way and so that we can make improvements to our Services. You (or the organization which you represent) will consent to our processing of your personal data (or those of its employees/representatives) when you or the organization you represent enters into a contract with us.
If you browse our Site	When you browse our Site, we may collect and process Behavioral Data and Technical Data to help us understand how you are using and navigating our Site. We do this so that we can better understand which parts of our Site are more or less popular and improve the structure and navigation of our Site. <i>Our legal basis for processing</i> It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you (or the organization you represent) for the Services, or it is in our legitimate interest to use personal data in such a way to ensure that we provide access to our Site in a secure and effective way and so that we can make improvements to our Site.
If you link to social media sites and interact with our social media pages	If you click on one of the social media links on our Site or otherwise interact with our social media pages such as on LinkedIn or Vimeo (including interacting with any 'like' or similar embedded features on our social media accounts), we and the relevant social media platform may receive information relating to such interaction and may share your personal data in connection with this purpose, such as certain Behavioral Data and Technical Data. For more information about how we use this personal data, please see the "Insight, analysis and retargeting through Cookies" section below. The relevant social media platform may also be a controller in respect of the personal data that is collected via your use of our

	social media pages and may use that personal data for additional purposes. For details of how the relevant social media platform uses your personal data, please see the privacy policy of the relevant social media platform. <i>Our legal basis for processing</i> It is in our legitimate interest to use personal data in the ways described above to ensure that we provide the Site in an effective way and to promote our Site via social media.
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FULFILMENT OF OUR SERVICES.

Fulfilment of our Services	We collect and maintain personal data that you submit to us for the purpose of supplying the range of data management and investment intelligence solutions we offer. We may collect and process your personal data when you are interacting with us on behalf of any organization you represent. The personal data we process may include your Identity Data and Contact Data (where applicable). We process this information so that we can comply with any regulatory checks we are obliged to perform, fulfil the supply of Services, maintain our user databases and to keep a record of how our Services are being used. If you attend one of our physical office locations, we will process personal data about you which you volunteer in connection with your visit and any inquiries you may have. This will usually include your Contact Data, and any other personal data you volunteer. Some Services we offer are also subject to separate terms and conditions which will also apply. <i>Our legal basis for processing</i> It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you and any laws we are subject to, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide the Services in an effective, safe and efficient way. If you provide such information to us via our "contact us" form, or in connection with any contract you consent to such processing of your personal data. You (or the organization which you represent) will consent to our processing of your personal data (or those
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	of its employees/representatives) when you or the organization you represent enters into a contract with us.
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CUSTOMER SERVICE AND INQUIRIES.

If you have a general question or need help with any issue concerning our Site or our Services	There are various ways in which you are able to contact us (see the “How to contact us” section below). In particular, our Site features a “Contact Us” form, which invites you to submit general inquiries about our Site. From time to time, you may also be able to submit specific inquiries on other pages of our Site, including in secure account areas within Rimes Online. When you make an inquiry, we will collect and process your Identity Data, Contact Data and, if applicable, certain Profile Data, as well as any other personal data you volunteer that is relevant to your inquiry. If you have a technical issue concerning our Site, we may also collect and process Behavioral Data and Technical Data to help us diagnose the technical issues you are experiencing and to help us resolve them in an efficient way. We use this information to manage and respond to your inquiry. <i>Our legal basis for processing</i> If you submit your personal data via the “Contact Us” form you consent to our processing your personal data in order to respond to your inquiry. It is in our legitimate interest to use your personal data in the ways described above to ensure that we are able to help you with your inquiry, provide a good standard of service and improve our customer services.
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INSIGHT, ANALYSIS AND RETARGETING THROUGH COOKIES.

If we use cookies to help us understand more about you and your use of our Site and our Services	We and our third-party partners use cookies, web beacons, pixel tags and other similar technologies (which we generically refer to as “Cookies”) to collect data from the devices that you use to access our Site and Services and any marketing emails that you receive from us. The data that is collected includes Behavioral Data and Technical Data, and certain Profile Data. Please see our Cookie Preference Centre for further information, including details of our third-party partners. We and our third-party partners use this data to analyze how you use our Site and our Services and the effectiveness of our Site and our Services, including:
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	• for the purposes described in the “If we carry out any online personalized advertising” section below; • to analyze how you use, and the effectiveness of, our Site and our Services; • to count users who have visited our Site or opened a marketing email and collect other types of information, including insights about visitor browsing habits, which helps us to improve our Site, and Services and the effectiveness of our emails; • to measure the effectiveness of our content; • to learn what parts of our Site are most attractive to our users, which parts of our Site are the most interesting and what kind of features and functionalities our visitors like to see; • to help us understand the type of marketing content that is most likely to appeal to our visitors and customers; and • to help us with the selection of future product and service lines, website design and to remember your preferences. <i>Our legal basis for processing</i> Where your data is collected through the use of non-essential cookies, we rely on consent to collect your personal data and for the onward processing purpose. Please see our Cookie Preference Centre for further details. In certain circumstances, we may rely on another lawful basis when we use your personal data collected via the use of cookies. For example, where we use personal data collected through the use of analytics cookies to analyze how you use our Site, it is in our legitimate interest to use your personal data in such a way to improve our Site and our Services.
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ADVERTISING AND MARKETING ACTIVITIES.

If we send you marketing communications by email	We use your Identity Data, Contact Data and Marketing and Communications Data to send you (or the organization you represent) marketing communications by email. Our marketing will include press releases and information about us, our Site and our Services. Our marketing communications will include personalized and non-personalized marketing. Personalized marketing has been specifically tailored to you and will include content that we think is most relevant to you, based on what we know about you.
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	Non-personalized marketing is marketing that is not tailored to you. Where we are sending you personalized marketing, we may also use Profile Data, and Behavioral Data to help us decide what sort of personalized marketing to send you (please see the “Insight, analysis and retargeting through Cookies” section above for more details). <i>Our legal basis for processing</i> It is in our legitimate interest to use your personal data for marketing purposes, for example to decide what marketing content we think may appeal to you. We rely on our legitimate interest to send marketing by email to business contacts of organizations who have purchased our Services. We may also rely on our legitimate interest to send marketing by email to certain business users of our Site and our and Services. When you submit your personal data via a “Contact Us” form you consent to our using such data to respond to your inquiry.
If we carry out any profiling	We and our third-party partners may use automatic means to process your Profile Data, Behavioral Data and Technical Data and other data that is collected through your interactions with third-party websites and services to create a profile of you to identify your preferences, behaviors and/or interests (“profiling”). We may engage in such profiling to send you marketing communications. We and our third-party partners may engage in such profiling to carry out online personalized advertising. We do not engage in profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. <i>Our legal basis for processing</i> It is in our legitimate interest to use your personal data for profiling you for marketing purposes, for example to decide what marketing content we think may appeal to you. Where we use your profiling to display online personal advertising to you, we rely on the consent that you have provided in respect of the collection of such data, or it is otherwise in our legitimate interests to promote our Site and and Services to you.

	Please see the “Insight, analysis and retargeting through Cookies” section above to learn about the legal basis that we rely on to collect data via the use of Cookies. Our third-party partners may rely on a different lawful basis in respect of their profiling and use of your personal data. Please read the privacy policy of the relevant third-party provider, as set out in our Cookie Preference Centre.
If we carry out any online personalized advertising, including cross-context behavioral advertising and targeted advertising	We and our third-party partners may use your Profile Data, Behavioral Data and Technical Data and other data that is collected through your interactions with third-party websites and services to provide you with, and analyze the effectiveness of, personalized ads when you visit other websites and/or use other services. By “personalized ads”, we mean advertisements for products and services that you have shown an interest in when you have used our Site or which you otherwise might be interested in based on your browsing habits, although our third-party partners may use the data that is collected to show personalized ads for products and services offered by third parties. “Personalized ads” include cross-context behavioral ads and targeted ads; these types of ads are personalized based on personal data that we or third parties collect about you from across multiple distinctly-branded websites, applications or services. <i>Our legal basis for processing</i> Please see the “Insight, analysis and retargeting through Cookies” section above to learn about the legal basis that we rely on to collect data via the use of Cookies. Where we use your personal data to display online personal advertising to you, we rely on the consent that you have provided in respect of the collection of such data, or it is otherwise in our legitimate interests to promote our Site and and Services to you. Our third-party partners may rely on a different lawful basis in respect of their use of your personal data. Please read the privacy policy of the relevant third-party provider, as set out in our Cookie Preference Centre.

RECEIPT OF PRODUCTS AND SERVICES FROM OUR SUPPLIERS.

If we have engaged you or the organization you	If we have engaged you or the organization you represent to provide us with products or services (for example, if you or the
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represent to provide us with products or services	organization you represent provide us with services such as IT support), we will collect and process your personal data in order to manage our relationship with you or the organization you represent, to receive products and services from you or the organization you represent, to comply with all legal and regulatory obligation we are subject to and, where relevant, to provide our Services to others. The personal data we collect from you may include your Identity Data and Contact Data and any other personal data you volunteer which is relevant to our relationship with you or the organization you represent. <i>Our legal basis for processing</i> It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or the organization you represent, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with you or the organization you represent and are able to receive the products and services that you or your organization provides, and provide our Services to others, in an effective way.
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SECURITY.

If we need to use your personal data in connection with the administration of our security measures	We have security measures in place at our premises, including building access controls. We may require visitors to our premises to sign in on arrival and where that is the case, we will keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need-to-know basis (e.g., to look into an incident). <i>Our legal basis for processing</i> It is in our legitimate interests to process your personal data so that we can keep our premises secure and provide a safe environment for our personnel and visitors to our premises.
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BUSINESS ADMINISTRATION AND LEGAL COMPLIANCE.

If we need to use your personal data to comply with our legal obligations or in connection with the	We may use your personal data: (i) to comply with our legal obligations; (ii) to enforce our legal rights; (iii) to protect the rights of third parties; and (iv) in connection with a business transition such as a merger, reorganization, acquisition by another company, or sale of any of our assets. <i>Our legal basis for processing</i>
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administration of our business	Where we use your personal data in connection with a business transaction, to comply with our legal obligations (with local laws and regulations for example), to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us, such as a court order.
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4 NOTICE OF RIGHT TO OPT OUT OF SALE/SHARING

We allow third parties to place Cookies on our Site that collect personal data from you which may be used by us or third parties to analyze your behavior or serve personalized ads to you. Under certain US state privacy laws (including California), our use of Cookies in such manner may be considered a “sale” of your personal data or the “sharing” of your personal data for cross-context behavioral advertising or targeted advertising purposes. Other than our collection and sharing of personal data via Cookies set by third parties, we do not engage in any activities that would be considered a “sale” of personal data. For example, we do not exchange your data for money.

Our business purposes for using Cookies in a manner that may be considered a “sale” of your personal data or the “sharing” of your personal data for cross-context behavioral advertising or targeted advertising purposes are the purposes described in the “[Insight, analysis and retargeting through Cookies](#)” and “[If we carry out any online personalized advertising](#)” sections above.

You have the right to opt out of our sale of your personal data or our sharing of your personal data for cross-context behavioral advertising or targeted advertising.

To opt out, click [Do Not Sell or Share My Personal Information](#).

To make choices with respect to certain third parties who may serve personalized ads and/or set and collect Cookies on our Site, please see below.

Google

- Please see Google’s privacy policy here: <https://policies.google.com/privacy>.
- If you do not wish for Google Analytics to gather information about how you interact with our Site, please install the Google Analytics Opt-out Browser Add-on available here: <https://tools.google.com/dlpage/gaoptout> and employ it at the start of each session on our Site.
- You have the option to manage Google’s personalized ads by visiting the Google Ad Center at <https://myadcenter.google.com/?ref=privacy-policy>.

LinkedIn

- Please see LinkedIn's privacy policy here:
<https://www.linkedin.com/legal/privacy-policy>.
- You have the option to manage your LinkedIn data privacy and advertising data settings in your LinkedIn account settings. For more details see:
<https://www.linkedin.com/help/linkedin/answer/a1337839/manage-your-account-and-privacy-settings?lang=en>.

To make choices about personalized ads from participating third parties, including to opt-out of receiving personalized ads from participating third parties, please visit the Network Advertising Initiative at <http://www.networkadvertising.org/choices/> or the Digital Advertising Alliance at www.aboutads.info/choices.

5 HOW LONG WE KEEP YOUR PERSONAL DATA

In respect of personal data that we process in connection with the supply of our Services, we may retain your personal data for as long as we necessarily require it to satisfy our business requirements, and in compliance with our data protection obligations. We may then destroy such files without further notice or liability. We will retain your personal data in line with our Retention Policy. We have set out some guiding principles below:

- Where we process personal data in connection with the registration and use of an account on Rimes Online, we may retain your personal data for up to 7 years from the date that the relevant account is terminated (and in compliance with our data protection obligations). We may then destroy such files without further notice or liability.
- Where we process any other personal data, we will retain relevant personal data for up to 7 years from the date of our last interaction with you (and in compliance with our data protection obligations). We may then destroy such files without further notice or liability.
- If any personal data is only useful for a short period (e.g., for a specific activity, promotion, or marketing campaign), we will not retain it for longer than the period for which it is used by us.
- If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future. However, we will not use this personal data to send you further marketing unless you subsequently opt back in to receive such marketing.

II. APPLICABILITY OF PRIVACY POLICY

6 PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy (including the [Notice at Collection of Personal Data](#) section above) explains our approach to any personal data that we might collect from United States residents or which we have obtained about United States residents from a third party, and the purposes for which we process the personal data of United States residents. This Privacy Policy also sets out the rights of United States residents in respect of our processing of your personal data.

This Privacy Policy is intended to assist you in making informed decisions when using our Site and our Services. Please take a moment to read and understand it. It should be read in conjunction with our [Website Terms of Use](#) and our [Cookie Policy](#).

Your access to and use of our Site, including your Rimes Online account, is subject at all times to our [Website Terms of Use](#). If your organization purchases Services from us, the purchase will be subject to the contractual terms agreed between your organization and us from time to time.

This Privacy Policy only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services (for example, where you follow links to third party websites over which we have no control).

7 NON-US RESIDENTS

If you are not a resident of the United States, then this Privacy Policy does not apply to you. Please visit our [Global Privacy Notice](#) for more information on our privacy policies and practices that are applicable to you.

8 THIRD-PARTY LINKS

This Privacy Policy only applies to personal data processed by us through your use of our Site and/or in connection with our business operations. However, from time to time, our Site may contain links to third-party websites and services. We have no control over these websites and services and this Privacy Policy does not apply to your interaction with the relevant third parties.

When you use a link to go from our Site to another website (even if you don't leave our Site) or you request a service from a third party, your browsing and interactions on any other websites, or your dealings with any other third-party service provider, is subject to that website's or third-party service provider's own rules and policies. For example, our Site invites you to connect with us on social media platforms such as LinkedIn, Vimeo,

Facebook and Twitter. When you click on the links we provide to such third-party platforms, you will be transferred from our Site to the relevant third-party platform and the Privacy Policy (and other terms and conditions) of that platform will apply to you.

We do not monitor, control or endorse the privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you use in connection with your interaction with us and to contact them if you have any questions about their respective privacy policies and practices.

III. ADDITIONAL INFORMATION ABOUT OUR COLLECTION, PROCESSING AND SHARING OF YOUR PERSONAL DATA

9 SOURCES OF PERSONAL DATA

We collect and receive personal data from different sources:

Personal data you provide to us	You may give us your personal data directly, for example, when you (or the organization you represent) purchases our Services, when you contact us with inquiries, complete forms on our Site such as the Contact Us form, subscribe to receive our marketing communications or provide feedback to us.
Personal data we collect using cookies and other similar technologies	When you access and use our Site, we may collect certain Behavioral Data and Technical Data. We collect this personal data by using cookies and other similar technologies (see the “Insight, analysis and retargeting through Cookies” section above).
Personal data received from third parties	We may receive personal data about you from third parties. Such third parties may include marketing and analytics providers, and third parties that provide technical services to us so that we can provide our Site and our Services such as the hosting platform for our website.

10 IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA

Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you or your organisation. This may apply where you do not provide the personal data we need in order to provide the Services you have requested from us or to process an application to register an account. In these circumstances, we may have to cancel your application or the provision of the relevant Services to you, in which case we will notify you.

11 HOW WE OBTAIN YOUR CONSENT

Where our use of your personal data requires consent, you can provide such consent at the time we collect your personal data following the instructions provided, or by informing us using the contact details set out in the “How to contact us” section below.

12 WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

Site visitors	If you browse our Site, we will collect and process your personal data in connection with your interaction with us and our Site.
Individuals who access Rimes Online	If your company has purchased Rimes Online, we may collect and process personal data in connection with the supply of Rimes Online to your company and when you log into and use Rimes Online.
People who contact us with inquiries	If you contact us with an inquiry through our Site using our Contact Us form, or provide any feedback or opinions to us in any forms we will collect and process your personal data in connection with your interaction with us and our Site.
People who work for our customers and suppliers	If you work for one of our customers or suppliers and have responsibility for placing orders with us, administering your organization’s account with us or handling our orders or our account with your organization, we will process your personal data in connection with your organization’s relationship with us.
Visitors to our physical locations	If you attend one of our offices, we may process personal data that you volunteer in connection with your visit and any inquiries you make. For example, you may volunteer personal data when signing in as a guest.

13 CATEGORIES OF THIRD PARTIES WITH WHOM WE SHARE PERSONAL DATA

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

When processing your personal data, we may need to share it with third parties, as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.

Category of Third Party	Description
Our affiliates (“Affiliates”)	We share personal data with entities within our group of companies for our business purposes as described in the “Our business purposes for collecting and processing personal data” section above.
Third-party suppliers who provide applications/ functionality, data processing or IT or other services (“Support Vendors”)	We share personal data with third parties who support us in providing our Site, our Business and help provide, run and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, sanctions checks, website design, hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centers around the world, and personal data may be stored in any one of them. We also share your personal data with third-party service providers to assist us with insight analytics. These providers are described in our Cookie Preference Centre .
Third-party post/email marketing and CRM specialists (“Marketing Vendors”)	We share personal data with specialist suppliers who assist us in managing our marketing database and sending out our post and email marketing communications and account-related communications.
Third-party advertising partners (“Advertisers”)	We share personal data with our third-party partners (including by allowing our third-party partners to collect Cookies from our Site) to provide you with, and analyze the effectiveness of, personalized ads when you visit other websites and/or use other services. For more information, see the “Insight, analysis and retargeting through Cookies” and “If we carry out any online personalized advertising” sections above.
Auditors, lawyers, accountants, other professional advisers and other parties for legal purposes (“Parties for Legal Purposes”)	We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organization and in relation to any disputes we may become involved in; as well as other third parties in connection with our business purposes described in the “Business administration and legal compliance” section above.

14 OUR USES OF PERSONAL DATA IN THE LAST 12 MONTHS

In the last twelve months, we have collected personal data, disclosed personal data to third parties for our business purposes, and sold or shared personal data to third parties for cross-context behavioral advertising (or targeted advertising).

Our business purposes for disclosing your personal data are all of the business purposes in the [“Our business purposes for collecting and processing personal data”](#) section above. Our

business purposes for selling your personal data or sharing your personal data for cross-context behavioral advertising or targeted advertising are those purposes identified “[Insight, analysis and retargeting through Cookies](#)” and “[If we carry out any online personalized advertising](#)” sections above.

For more information on our uses of personal data in the last twelve months, click [here](#).

Category of Personal Data	Collected in Last 12 Months	Disclosed for Our Business Purposes in Last 12 Months to Categories of Third Parties	Sold or Shared for Cross-Contextual Behavioral Advertising in Last 12 Months to Categories of Third Parties
Identifiers (for example, name, postal address, email address, IP address, unique personal identifiers)	Yes	Yes to Affiliates, Support Vendors, Marketing Vendors, Advertisers and Parties for Legal Purposes	Yes to Affiliates, Marketing Vendors and Advertisers
Personal information (for example, name, address, telephone number, credit card number)	Yes	Yes to Affiliates, Support Vendors, Marketing Vendors, Advertisers and Parties for Legal Purposes	Yes to Affiliates, Marketing Vendors and Advertisers
Characteristics of protected persons (for example, age, race, national origin, citizenship, religion, sex/gender)	No*	Not applicable	Not applicable
Commercial information (for example, records of products or services purchased or considered)	Yes	Yes to Affiliates, Support Vendors, Marketing Vendors, Advertisers and Parties for Legal Purposes	Yes to Affiliates, Marketing Vendors and Advertisers
Biometric information (for example, fingerprints and voiceprints)	No*	Not applicable	Not applicable
Internet or other electronic network	Yes	Yes to Affiliates, Support Vendors, Marketing	Yes to Affiliates, Marketing Vendors and Advertisers

activity (for example, browsing history, search history, website interactions)		Vendors, Advertisers and Parties for Legal Purposes	
Geolocation data (for example, device location)	Yes	Yes to Affiliates, Support Vendors, Marketing Vendors, Advertisers and Parties for Legal Purposes	Yes to Affiliates, Marketing Vendors and Advertisers
Sensory data (audio, electronic, visual, thermal, olfactory, or similar information)	No*	Not applicable	Not applicable
Professional or employment-related information	Yes	Yes to Affiliates, Support Vendors, Marketing Vendors, Advertisers and Parties for Legal Purposes	Yes to Affiliates, Marketing Vendors and Advertisers
Non-public education information	No*	Not applicable	Not applicable
Inferences drawn from other personal data to create a consumer profile	Yes	Yes to Affiliates, Support Vendors, Marketing Vendors, Advertisers and Parties for Legal Purposes	Yes to Affiliates, Marketing Vendors and Advertisers
Other non-sensitive data you choose to provide (for example, you may choose to provide data in any of the above categories even if we do not specifically collect it)	Yes	Yes to Affiliates, Support Vendors and Parties for Legal Purposes	No
Sensitive Personal Data			
Category of Sensitive Personal Data	Collected in Last 12 Months	Disclosed for Our Business Purposes in Last 12 Months to Categories of Third Parties	Sold or Shared for Cross-Contextual Behavioral Advertising in Last 12 Months to Categories of Third Parties

Government identifying numbers (social security, driver's license, state ID, or passport numbers)	No*	Not applicable	Not applicable
Complete account credentials (account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account)	Yes	No	No
Precise geolocation	No*	Not applicable	Not applicable
Racial or ethnic origin, religious or philosophical beliefs, or union membership	No*	Not applicable	Not applicable
Mail, email, or text message contents not directed at us	No*	Not applicable	Not applicable
Genetic data	No*	Not applicable	Not applicable
Biometric information processing for the purpose of uniquely identifying an individual	No*	Not applicable	Not applicable
Health, sex life, or sexual orientation	No*	Not applicable	Not applicable
Other sensitive data you choose to provide (for example,	Yes	No	No

you may choose to provide data in any of the above categories even if we do not specifically collect it)			
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*Not specifically collected by us but may be included in the category of “other information you choose to provide”.

IV. YOUR PRIVACY RIGHTS AND CHOICES

15 NOTICE OF YOUR PERSONAL DATA RIGHTS

You have certain rights in relation to the personal data we hold about you. These rights include the right: (i) to obtain copies of your personal data; (ii) to have your personal data corrected or deleted; (iii) to limit the way in which your personal data (including sensitive personal data) is used; (iv) to object to our use of your personal data; (v) to opt out of sale and sharing of your personal data for behavioral advertising and third-party marketing; (vi) to transfer your personal data; (vii) not to be subject to decisions based on automated processing (including profiling); and (viii) to complain to a supervisory authority. If you would like to exercise any of these rights, please contact us using the details set out in the [“How to contact us”](#) section below.

Your right to know or access	If you ask us, we disclose certain information to you about our processing of your personal data: (i) whether or not we are processing your personal data; (ii) categories of your personal data we have collected; (iii) the categories of sources for your personal data we have collected; (iv) our business purposes for collecting, selling or sharing that personal data; (v) the categories of third parties to whom we disclosed your personal data; (vi) the types of personal data we shared with third parties for third parties’ direct marketing purposes and the identities of such third parties; and (vii) specific pieces of personal data we collected about you and access to, or a copy of that personal data. If you require additional copies, we may charge a reasonable fee for producing those additional copies.
Your right to rectification or correction	If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we’ll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we’ve shared your personal data with so that you can contact them.

Your right to erasure or deletion	You can ask us to delete or remove your personal data in some circumstances, subject to certain exemptions under applicable privacy law. If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.
Your right limit use of sensitive personal data	You can ask us to limit the use or disclosure of your sensitive personal data to just those actions necessary to perform specific purposes outlined by law. We do not use or disclose sensitive personal data (for example, government identifying numbers, complete account credentials, racial or ethnic origin, religious or philosophical beliefs, union membership, content of mail, email and text messages not directed at us, genetic data or health, sex life or sexual orientation information) for purposes other than purposes that would continue to be allowable after the receipt of a limitation request, including to provide services to you.
Your right to restrict processing	You can ask us to “block” or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we’ve shared your personal data with others, we’ll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we’ll also tell you who we’ve shared your personal data with so that you can contact them directly.
Your right to data portability	You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.
Your right to object	You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else’s legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.
Your right to opt out of sale and sharing for behavioral advertising and third-party marketing	You can ask us to stop selling your personal data or sharing your personal data with third parties for cross-context behavioral advertising (and targeted advertising) and for third parties’ direct marketing purposes. Other than our collection and sharing of personal data via Cookies set by third parties, we do not engage in any activities that would be considered a “sale” of personal data.

	See our “Notice of right to opt out of sale/sharing” section above for more details.
Your rights in relation to automated decision-making and profiling	You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us. We do not carry out automated decision making.
Your right to withdraw consent	If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact details in the “How to contact us” section below or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.
Your right to lodge a complaint with the supervisory authority	If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the “How to contact us” section below. If applicable, you can also report any issues or concerns to a supervisory authority in the state of your residence or the place of the alleged infringement.
Your right to non-discrimination	You have the right to be free from unlawful discrimination for exercising your rights under privacy law applicable to you.

16 HOW TO EXERCISE YOUR PERSONAL DATA RIGHTS

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a written request (via one of the methods described below) 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 may ask for information to verify your identity, such as name, phone number, email and address. For a request to opt out of sale or behavioral advertising, we do not require a verifiable request. We will only use personal data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request promptly within the timeframes required by applicable privacy law (usually between 15 to 45 days depending on the type of Valid Request, with the right for us to extend the response time as necessary). We will not charge you a fee for making a Valid Request unless your Valid Request is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a

fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using any of the following methods:

- Contact us using our Contact Us form on the website linked [here](#);
- Send us an email at: info@rimes.com; or
- To exercise your right to opt out of sale and sharing for behavioral advertising, you may also click [Do Not Sell or Share My Personal Information](#).

You may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

In some instances, we may not be able to honor your request. For example, we may not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we may not honor your request where not required to do so under applicable privacy laws. For example, we may deny a deletion request if the information is necessary for us to provide our services to you or comply with our legal obligations. We may decline to honor requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backups), or for which access is not otherwise required.

You have the right to appeal our decision to not honor your request or our refusal to take action on a request within a reasonable period of time by contacting us at the email listed above and clearly stating that the purpose of the contact is an "appeal of privacy rights." Within 45 days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

V. ADDITIONAL PRIVACY POLICIES AND PRACTICES

17 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA

We are committed to keeping the personal data you provide to us secure, and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e., those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of our Site, those who purchase our Services and our suppliers and their employees.

Despite our efforts to ensure security, we cannot guarantee or warrant that personal data will not be accessed, acquired, disclosed for an improper purpose, altered or destroyed by an unauthorized person or as a result of a breach of our security safeguards or those of our hosting provider or other vendors or service providers. We cannot ensure the security of any data transmitted to us over the internet. To the fullest extent permitted by applicable law, we accept no liability for any unintentional disclosure by us of personal data. Therefore, we urge you to take adequate precautions to protect personal data as well, including, without limitation, never sharing your account username or password.

18 PERSONAL DATA OF MINORS

We do not knowingly collect or process the personal data of data subjects who are 16 years old or younger. If you are a child under the age of 16, please do not attempt to use our Site or Services or send us any personal data. If we discover that we are holding the personal data of a minor, we will delete that information as soon as possible. Please contact us if you have reason to believe that a minor may have submitted personal data to us (see the “How to contact us” section below).

To our knowledge, we do not sell, or share for cross-context behavioral advertising or targeted advertising purposes, the personal data of children under the age of 16.

19 PERSONAL DATA OF OTHERS YOU SHARE WITH US

You may not disclose the personal data of another individual to us unless you have their prior written consent or are otherwise authorized under applicable law to share their information with us. To the extent that you provide another individual’s personal data to us or we collect another individual’s personal data on your behalf, you acknowledge and agree that you are responsible for compliance with all applicable laws concerning such personal data, including:

- providing all applicable notices;
- receiving the proper authority or consent to allow us to process such personal data; and
- responding to data subject requests.

20 DO NOT TRACK

“Do Not Track” is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. Our Site is not currently configured to respond to Do Not Track signals or other mechanisms that provide users the ability to exercise

choice regarding the collection of personal data about a user’s online activities over time and across third-party websites or online services.

VI. AMENDMENTS AND CONTACT INFORMATION

21 AMENDMENTS TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect any changes or proposed changes to our use of your personal data, or to comply with changes in applicable law or regulatory requirements. When we do, we will post the revised policy on our Site. We may, but are not required to, also provide you with notice of the amended Privacy Policy via any others means we consider reasonable, including, without limitation, email, posting in our Services, or updates to our Services. Your continued use of our Site or Services or your provision of personal data to us following the posting of changes (or other notice we provide in our sole discretion) constitutes your acceptance of such changes and the Privacy Policy as amended. We may, but are not required to, also provide you with alternative means of accepting any changes to or amended version of this Privacy Policy. We encourage you to review this Privacy Policy periodically to keep up to date on how we use your personal data. If we update this Privacy Policy, we will update the “Last Updated” date at the top of the page.

22 HOW TO CONTACT US

This is the Privacy Policy for Rimes Technologies Corporation, a New York corporation with offices at. 10 East 40th Street, New York, New York 10016.

If you have any questions about this Privacy Policy or want to exercise your rights as a data subject set out in this Privacy Policy, you can contact us using the following methods:

On Site	Contact us using our Contact Us form on the website linked here .
Email	Send us an email at: info@rimes.com
Post	Write to us at: Attn: Legal, 10 East 40th Street, New York, New York 10016.

Third Party Opt-Out Options

To make choices with respect to certain third parties who may serve personalized ads (including cross-context behavioral ads or targeted ads) and/or who set and collect Cookies on our Site, please see below.

GOOGLE

- Please see Google's privacy policy here: <https://policies.google.com/privacy>.
- If you do not wish for Google Analytics to gather information about how you interact with our Site, please install the Google Analytics Opt-out Browser Add-on available here: <https://tools.google.com/dlpage/gaoptout> and employ it at the start of each session on our Site.
- You have the option to manage Google's personalized ads by visiting the Google Ad Center at <https://myadcenter.google.com/?ref=privacy-policy>.

LINKEDIN

- Please see LinkedIn's privacy policy here: <https://www.linkedin.com/legal/privacy-policy>.
- You have the option to manage your LinkedIn data privacy and advertising data settings in your LinkedIn account settings. For more details see: <https://www.linkedin.com/help/linkedin/answer/a1337839/manage-your-account-and-privacy-settings?lang=en>.

To make choices about personalized ads from participating third parties, including to opt-out of receiving personalized ads from participating third parties, please visit the Network Advertising Initiative at <http://www.networkadvertising.org/choices/> or the Digital Advertising Alliance at www.aboutads.info/choices.

Third Party Opt-Out Options

To make choices with respect to certain third parties who may serve personalized ads (including cross-context behavioral ads or targeted ads) and/or who set and collect Cookies on our Site, please see below.

Google

- Please see Google's privacy policy here: <https://policies.google.com/privacy>.
- If you do not wish for Google Analytics to gather information about how you interact with our Site, please install the Google Analytics Opt-out Browser Add-on available here: <https://tools.google.com/dlpage/gaoptout> and employ it at the start of each session on our Site.
- You have the option to manage Google's personalized ads by visiting the Google Ad Center at <https://myadcenter.google.com/?ref=privacy-policy>.

LinkedIn

- Please see LinkedIn's privacy policy here:
<https://www.linkedin.com/legal/privacy-policy>.
- You have the option to manage your LinkedIn data privacy and advertising data settings in your LinkedIn account settings. For more details see:
<https://www.linkedin.com/help/linkedin/answer/a1337839/manage-your-account-and-privacy-settings?lang=en>.

To make choices about personalized ads from participating third parties, including to opt-out of receiving personalized ads from participating third parties, please visit the Network Advertising Initiative at <http://www.networkadvertising.org/choices/> or the Digital Advertising Alliance at www.aboutads.info/choices.