



## TESSIAN PRIVACY NOTICE

(EFFECTIVE DATE 10 SEPTEMBER 2021)

<b>How we use your personal information</b>	<p>This policy is for people whose information, including <a href="#">personal information</a> (as defined under privacy laws), we use as part of Tessian’s business. It applies to any Tessian services that link or refer to this policy (the “<b>Service</b>”). We will update and amend it from time to time, so please check back to make sure you have read the most recent version.</p> <p>Please read this notice carefully to understand how we use your information, including personal information, and, importantly, your rights and choices. If you have any questions or wish to exercise your rights and choices, please contact us as set out in the “Contact Us” section. If you are a Nevada or California resident, please see the additional disclosures at the end of this policy.</p>
<b>Who we are</b>	<p>We are Tessian Limited (<b>Tessian, we, us, our</b>). We are a company registered in England and Wales with company number 08358482 and registered office at 3 Finsbury Avenue, London, EC2M 2PA. We are registered with the Information Commissioner’s Office with registration number ZA036200.</p> <p>Tessian provides a machine intelligent email security platform and related services. As well as handling personal information on behalf of our clients, we use personal information to improve our services. We also collect the personal information of people we work with and people who visit our website.</p>
<b>People who use our website</b>	
<b>What information we collect</b>	<p>When you visit our website we collect the following information about your computer or device –</p> <ul style="list-style-type: none"><li>• The Internet Protocol (IP) address used to connect to the Internet.</li><li>• Browser type (including version and plugins).</li><li>• Operating system and platform.</li><li>• Location Data, such as location derived from an IP address or data that indicates a city or postal code level).</li></ul> <p>We also collect the following information about your visit –</p> <ul style="list-style-type: none"><li>• The full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time).</li><li>• Products you viewed or searched for.</li><li>• Page response times.</li></ul>

	<ul style="list-style-type: none"> <li>• Download errors.</li> <li>• Length of visits to certain pages.</li> <li>• Page interaction information (such as scrolling, clicks, and mouse-overs).</li> <li>• Methods used to browse away from the page.</li> </ul> <p>(Please also see the Cookies section of this policy below).</p> <p>If you complete one of our webforms we will collect your name, contact information and any other personal information you provide. You may choose to voluntarily provide other information to us that we do not request, and, in such instances, you are solely responsible for such information.</p>
<b>How we collect this information</b>	<p>We collect and temporarily log IP addresses just as part of the routine operation of our website, together with information about your computer or device and visit to our website.</p>
<b>What we use this information for</b>	<p>We do not IP addresses for any other purpose, except as otherwise described in this policy. We collect information about your computer or device and visit to our website to optimise your visit and improve our services.</p> <p>If you contact us through the website, we will use your name, contact information and any other information to respond to your query and provide you with any requested services.</p>
<b>Legal ground for our use of your personal information</b>	<p>Our legal ground for using the personal information we collect via our website is that doing so is necessary for the purposes of the legitimate interests of our business. We will always consider your rights and privacy before using your personal information for the purposes of our business. Where your rights or privacy override our business interests, we will not use your personal information for such business interests.</p> <p>Separately from our solely commercial business purposes, we will also use your personal information where we have a legal obligation to do so. For example, if a regulator or official authority asks us for your personal information. In very limited situations we may also use your personal information to exercise our legal rights (including in relation to legal proceedings).</p>
<b>Sharing your information</b>	<p>We use IT and hosting providers to support our website. These organisations are <b>processors</b> that handle your information on our behalf. We have agreements in place so that these organisations only handle your personal information as we have instructed them to. They are not able to make any further use of your personal information (except where required by law).</p> <p>The processors we use include –</p> <ul style="list-style-type: none"> <li>• Heroku – to deploy, operate and apply security controls to our website.</li> <li>• Hubspot – to capture data via webforms.</li> </ul>

	<ul style="list-style-type: none"> <li>• Drift – to provide livechat services.</li> <li>• Hotjar which shows which pages people are viewing on our website.</li> </ul> <p>If we collect information for one purpose and then intend to use it for a different purpose, we will seek your consent to do so and/or inform you where necessary or appropriate.</p>
<b>Transferring information outside the European Economic Area</b>	<p>Some of our service providers are based outside of the European Economic Area (EEA). When we send your personal information outside the EEA to a country or sector not recognised as providing appropriate protections, we either ensure that the General Data Protection Regulation (GDPR) applies to the personal information outside the EEA or we will put in place appropriate contracts approved by the EU or other safeguards to ensure your rights are protected. Details of these safeguards are available on request.</p>
<b>Tracking technology, advertising, and analytics</b>	<p>We use certain technologies to automatically collect the information described in this policy, including:</p> <p><b>Cookies</b></p> <p>We use <a href="#">cookies</a> to ensure that you get the most out of our website. Cookies are small amounts of information in the form of text files which we store on the device you use to access our website. Cookies allow us to monitor your use of our website so that we can make improvements to your experience when you browse and simplify your use of our website.</p> <p>If you do not wish for cookies to be installed on your device, you can change the settings of your browser or device to reject some cookies. For more information about how to reject cookies using your internet browser settings, please consult the “Help” section of your internet browser (or alternatively visit <a href="http://www.aboutcookies.org">www.aboutcookies.org</a>). Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of the Site and your experience may be less satisfying.</p> <p>The name of the cookies used by the Site and the purposes for which these cookies are used are as follows:</p> <p><b>Drift</b></p> <p>We use Drift to analyse how website visitors interact with our website. We use this information to identify trends and help us improve our website. The cookies collect information in an anonymous form, including information about the geographical location of anybody who starts a “live chat” on the website, and which pages they visited.</p> <p><b>HotJar</b></p> <p>We use HotJar to analyse how website visitors interact with our website. We use this information to identify trends and help us improve our website.</p>



The cookies collect information in an anonymous form about visitors to the website, including what pages they visited, what pages they clicked on and how they scrolled on a page.

**Google Analytics**

We use Google Analytics to analyse how website visitors interact with our website. We use this information to identify trends and help us improve our website.

The cookies collect information in an anonymous form about visitors to the site, including what pages they visited, how long they stay on each page for and the number of clicks.

**Oribi**

We use Oribi to analyse how website visitors interact with our website. We use this information to identify trends and help us improve our website.

The cookies collect information in an anonymous form about visitors to the site, including what pages they visited, how long they stay on each page for and the number of clicks.

**Log Files**

Log files are files that record events that occur in connection with your use of the Service.

**Pixels**

Pixels, or web beacons, are code embedded in a website, video, email, or advertisement that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a website, video, email, or advertisement that contains a pixel, the pixel may permit us or a separate entity to drop or read cookies on your browser. Pixels are used in combination with cookies to track activity by a particular browser on a particular device. We may incorporate pixels from separate entities, including Facebook, which allow us to track our conversions, bring you advertising both on and off the Service, and provide you with additional functionality, such as the ability to connect our Service with your social media account.

In addition, we work with agencies, advertisers, ad networks, and other technology services to place ads about our products and services on other websites and services. For example, we place ads through Google and Facebook that you may view on their platforms as well as on other websites and services.

As part of this process, we may incorporate tracking technologies into our own Service (including our website and emails) as well as into our ads displayed on other websites and services. Some of these tracking technologies may track your

	<p>activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you (“Interest-based Advertising”).</p> <p>We also use audience matching services (which is a type of Interest-based Advertising) to reach people (or people similar to people) who have visited our Service or are identified in one or more of our databases (“Matched Ads”). This is done by us providing a list of hashed email addresses to an ad partner or incorporating a pixel from an ad partner into our own Service, and the ad partner matching common factors between our data and their data. For instance, we incorporate the Facebook pixel on our Service and may share your email address with Facebook as part of our use of Facebook Custom Audiences.</p>
<p><b>How long we keep your information</b></p>	<p>We keep IP addresses and information about your visit to our website in a log for six months.</p> <p>We keep information you provide to us via webforms for the shorter of (i) the period of providing the service or responding to the enquiry as long as such continues; or (ii) 7 years, save always subject to you exercising your rights to opt out and/or be forgotten.</p>
<p><b>Customers and other individuals we work with</b></p>	
<p><b>What information we collect</b></p>	<p>As part of our business we work with a range of organisations – including customers and suppliers. We think it is important to respect the privacy of the individuals who work for, with and as part of these organisations.</p> <p>We collect and use the following types of information from customers and others we work with –</p> <ul style="list-style-type: none"> <li>• Contact information (for example, address, email address and phone numbers).</li> <li>• Basic personal information (for example, name, organisation, job).</li> <li>• Login and other relevant details for our customer portal.</li> <li>• Details of any contact or correspondence we have had, including voice recordings of outbound telephone calls.</li> <li>• Financial details (for example, details of any payments we have made to or received from you (or your organisation)).</li> <li>• Information about how you (or your organisation) use our services.</li> <li>• Personal information contained in emails protected by our services</li> </ul>
<p><b>How we collect this information</b></p>	<p>We will mainly collect this information when you (or your organisation) or one of our customers –</p> <ul style="list-style-type: none"> <li>• Enter into an agreement with us.</li> <li>• Enquire about our services.</li> </ul>

	<ul style="list-style-type: none"> <li>• Respond to an enquiry from us.</li> <li>• Correspond with us (email, telephone or post).</li> <li>• Login to our customer portal.</li> <li>• Are referred to us by a third party.</li> <li>• Make the information publicly available (for example, on company websites or LinkedIn).</li> <li>• Receive services from us.</li> <li>• Provide services to us.</li> <li>• Send or receive email that are protected by our services.</li> <li>• CCTV on our premises collects personal information about all visitors.</li> <li>• Via our website (please see People who use our website section of this notice).</li> </ul>
<p><b>What we use your information for</b></p>	<p>We use your information to –</p> <ul style="list-style-type: none"> <li>• Provide you (or your organisation) or our customers with our services and important information relating to our services.</li> <li>• Receive services from you (or your organisation).</li> </ul> <p>We may also use your information to –</p> <ul style="list-style-type: none"> <li>• Provide our services, including demonstrations and proof of value versions of the Service.</li> <li>• Ensure our work is well targeted, relevant and effective.</li> <li>• Market our services, including communications with you regarding events and promotions.</li> <li>• Analyse and continually improve the services we offer and our website.</li> <li>• Keep our accounts, records and databases accurate and relevant.</li> <li>• Support and manage our staff.</li> <li>• Fulfil our legal obligations (including where required by regulators and official authorities).</li> <li>• Exercise our legal rights (including in relation to legal proceedings).</li> <li>• Prevent and address fraud, breach of policies or terms, and threats or harm.</li> <li>• Conduct research, including focus groups and surveys.</li> <li>• Improve the Service and other Tessian websites, apps, marketing efforts, products and services.</li> <li>• Fulfil any other purpose at your direction.</li> </ul>
<p><b>Legal grounds for using your personal information</b></p>	<p>Where we have a contract with you as an individual, we will use your personal information where necessary for the purposes of the contract. Importantly, if you do not provide us with sufficient and/or accurate personal information, we may not be able to enter into or fulfil a contract with you.</p> <p>However, in most situations, our legal ground for the use of your personal</p>

	<p>information is that doing so is necessary for the purposes of the legitimate interests of our business. We will always consider your rights and your privacy before using your personal information for the purposes of our business. Where your rights or privacy override our business interests, we will not use your personal information.</p> <p>Where the law requires you to opt in, the legal ground for sending you information about our services will be your consent.</p> <p>Separately from our solely commercial business purposes, we will also use your personal information where we have a legal obligation to do so. For example, if a regulator or official authority asks us for your personal information. In very limited situations we may also use your personal information to exercise our legal rights (including in relation to legal proceedings).</p> <p>If we collect information for one purpose and then intend to use it for a different purpose, we will seek your consent to do so and/or inform you where necessary or appropriate.</p>
<p><b>Sharing your information</b></p>	<p>We use a number of IT, hosting and service providers to support our business. These organisations are <b>processors</b> that handle your information on our behalf. We have agreements in place so that these organisations only handle your personal information as we have instructed them to. They are not able to make any further use of your personal information (except where required by law). If you would like more information about these organisations please contact us using the details below.</p> <p>The processors we use include –</p> <ul style="list-style-type: none"> <li>• Heroku – to deploy, operate and apply security controls to our website.</li> <li>• Hubspot – to capture data via webforms.</li> <li>• Drift – to provide livechat services.</li> <li>• Hotjar which shows which pages people are viewing on our website.</li> <li>• Gong.io – to capture voice analytics on outbound calls.</li> </ul> <p>We may also share information with –</p> <ul style="list-style-type: none"> <li>• A company which is a member of our group.</li> <li>• A third party that we work with where necessary for the purposes of granting you access to our website.</li> <li>• A third party or affiliate that we work with where necessary for the purposes of delivering our services or services from that third party or affiliate (for example, when you sign up with Tessian to attend a conference, or interact with our content on social networks).</li> <li>• A third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).</li> </ul>

	<ul style="list-style-type: none"> <li>• A selected third party that you consent to our sharing your information with for marketing purposes as we refer to above.</li> </ul> <p>Separately from our solely business purposes, we will also use your information where we have a legal obligation to do so. For example, if a regulator or official authority asks us for your information. In very limited situations, we may also use your information to exercise our legal rights (including in relation to legal proceedings) or in order to further protect the rights, property, life, health, security, and safety of us, the Service, or anyone else.</p>
<b>Transferring information outside the European Economic Area</b>	<p>Some of our service providers are based outside of the European Economic Area (EEA). When we send your personal information outside the EEA to a country or sector not recognised as providing appropriate protections, we either ensure that the General Data Protection Regulation (<b>GDPR</b>) applies to the personal information outside the EEA or we will put in place appropriate contracts approved by the EU or other safeguards to ensure your rights are protected. Details of these safeguards are available on request.</p>
<b>How long we keep your personal information</b>	<p>To ensure we are able to meet our legal obligations and exercise our legal rights, we may store your personal information for up to seven years after it was last potentially needed for our business purposes, unless there is no legal need to do this, and in which case your data will be deleted as soon as it is no longer needed for the purposes in which it was collected.</p>
<h2>Applicants</h2>	
<p>Where people apply for roles with Tessian, it will be necessary for us to use personal information for the recruitment process.</p>	
<b>What information we collect</b>	<p>If you apply for a job with us, we will collect the following categories of personal information –</p> <ul style="list-style-type: none"> <li>• Personal details (name, title, address, contact details and emergency contact).</li> <li>• Email address.</li> <li>• Employment history.</li> <li>• Education history.</li> <li>• Any personal information you provide in CVs, application forms or other correspondence.</li> <li>• Any personal information you provide to us during interviews.</li> </ul> <p>We may also collect, store and use the following <a href="#">special categories</a> of more sensitive personal information –</p>



	<ul style="list-style-type: none"> <li>• Race or ethnicity.</li> <li>• Religious or philosophical beliefs.</li> <li>• Sexual orientation.</li> <li>• Political opinions.</li> <li>• Information concerning health (for example, medical conditions, disabilities and health and sickness records).</li> </ul> <p>We carry out background checks on all potential employees. Onfido carries out these checks.</p>
<p><b>How we collect this information</b></p>	<p>If you apply for a job with us, we collect personal information about you from the following sources –</p> <ul style="list-style-type: none"> <li>• Directly from you (for example, information provided on CVs, application forms and during interviews).</li> <li>• Right to work documents (for example, passports and visas).</li> <li>• Recruitment agencies.</li> <li>• Referees and former employers.</li> <li>• Disclosure and Barring Service in respect of criminal convictions.</li> <li>• Publicly available information (for example, company websites and LinkedIn).</li> <li>• CCTV on our premises collects personal information about all visitors.</li> </ul>
<p><b>What we use your information for</b></p>	<p>We use and store personal information relating to applicants to decide whether they are suitable for employment with Tessian. This will involve using personal information to do the following –</p> <ul style="list-style-type: none"> <li>• Assess skills, qualifications, and suitability for a role.</li> <li>• Establish right to work.</li> <li>• Carry out background and reference checks, where applicable.</li> <li>• Communicate with you about the recruitment process.</li> <li>• Keep records related to our hiring processes.</li> <li>• Comply with legal or regulatory requirements.</li> </ul> <p>We will use your special category personal information in the following ways –</p> <ul style="list-style-type: none"> <li>• We will use information about health or disability status to consider whether we need to provide reasonable adjustments.</li> <li>• We will use information about health or disability status, race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.</li> <li>• Establish right to work.</li> </ul>

	<p>Where we use and store special category personal information as part of the recruitment process we do so on the legal grounds that it is either necessary for rights and obligations associated with potential employment or where necessary for a substantial public interest based on the law.</p> <p>We may also need to use or store special category personal information which we have collected as part of the recruitment process to meet legal duties or where it is necessary for the purposes of legal claims. Where we use your special category personal information for our legal obligations our legal ground for doing so is that it is necessary for a substantial public interest based on the law.</p>
<b>Legal grounds for using your personal information</b>	<p>Our main legal ground for using your personal information is that it is necessary to take steps at your request to decide whether to enter into a contract of employment.</p> <p>Where we use your personal information for reasons other than entering into a contract with you, we will only do so on the legal ground that doing so is necessary for the purposes of the legitimate interests of our business. We will always consider your rights and privacy before using your personal information for the legitimate interests of our business. Where your rights or privacy override our business interests, we will not use your personal information.</p> <p>We may also need to use personal information which we have collected as part of the recruitment process to meet legal duties or where it is necessary for the purposes of legal claims.</p>
<b>If you fail to provide personal information</b>	<p>If an applicant fails to provide information when requested, which is necessary for us to consider an application (such as evidence of qualifications or employment history), we will not be able to process the application successfully.</p>
<b>Sharing your information</b>	<p>We disclose personal information to the following organisations which assist us with the recruitment process –</p> <ul style="list-style-type: none"> <li>• Recruitment agencies.</li> <li>• Former employers.</li> <li>• Onfido.</li> <li>• HMRC and other government bodies.</li> <li>• Third party service providers who assist us with administering our HR and recruitment. This may include payroll processors, benefits administration providers, and insurance providers. Any such third parties will only be permitted to use your personal data for specific purposes in accordance with our instructions and not for their own purposes.</li> </ul>
<b>Transferring information outside the</b>	<p>Some of our service providers are based outside of the European Economic Area (EEA). When we send your personal information outside the EEA to a country or sector not recognised as providing appropriate protections, we either ensure that</p>



<p><b>European Economic Area</b></p>	<p>the General Data Protection Regulation (<b>GDPR</b>) applies to the personal information outside the EEA or we will put in place appropriate contracts approved by the EU or other safeguards to ensure your rights are protected. Details of these safeguards are available on request.</p>
<p><b>How long we store personal information</b></p>	<p>We will retain personal information collected for the recruitment process for a period of two years after we have told an applicant our decision about whether or not to appoint them to a role.</p> <p>We retain personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against applicants on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way.</p> <p>After this period, where an applicant has not been appointed to a role we will securely destroy personal information. Where an applicant is appointed to a role, we will add their recruitment information to a file about their employment.</p> <p>If we wish to retain personal information relating to an applicant on file, on the basis that a further opportunity may arise in future, we will write to the applicant separately, to seek consent to retain personal information for a fixed period on that basis.</p> <p>Notwithstanding elsewhere in this policy, we may use and share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the “Your rights and managing your information” section below.</p>
<p><b>Information from Other Sources</b></p>	
<p><b>Information from Other Sources</b></p>	<p>We also collect information from other sources. The categories of sources from which we collect information include:</p> <ul style="list-style-type: none"> <li>• Data brokers from which we purchase data to supplement the data we collect.</li> <li>• Social networks with which you interact.</li> <li>• Partners that offer co-branded services, sell or distribute our products, or engage in joint marketing activities (for example, conference hosts).</li> </ul> <p>Publicly-available sources, including data in the public domain</p>
<p><b>Other Parties</b></p>	



<b>Other Parties</b>	<p>We offer parts of our Service through websites, platforms, and services operated or controlled by other parties. In addition, we integrate technologies operated or controlled by other parties into parts of our Service.</p> <p>Some examples include:</p> <ul style="list-style-type: none"><li>• <b>Links.</b> Our Service includes links that hyperlink to websites, platforms, and other services not operated or controlled by us.</li><li>• <b>Liking and Sharing.</b> We may embed a pixel or SDK on our Service that allows you to “like” or “share” content on social media. If you choose to engage with such integration, we may receive information from the social network that you have authorized to share with us. Please note that the social network may independently collect information about you through the integration.</li><li>• <b>Brand Pages and Chatbots.</b> We may offer our content through social media. Any information you provide to us when you engage with our content (such as through our brand page or via our chatbots) is treated in accordance with this policy. Also, if you publicly reference our Service on social media (e.g., by using a hashtag associated with Tessian in a tweet or post), we may use your reference on or in connection with our Service.</li></ul> <p>Please note that when you interact with other parties, including when you leave our Service, those parties may independently collect information about you and solicit information from you. The information collected and stored by those parties remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the EEA, U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.</p>	
<b>Your rights and managing your information</b>		
<b>Your rights and managing your information</b>	Do Not Track	Do Not Track. Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to “Do Not Track”

		<p>signals. For more information on “Do Not Track,” visit <a href="http://www.allaboutdnt.com">http://www.allaboutdnt.com</a>.</p>
	<p>Analytics and Interest-Based Advertising</p>	<p>Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> and by Google Analytics for Display Advertising or the Google Display Network at <a href="https://www.google.com/settings/ads/onweb/">https://www.google.com/settings/ads/onweb/</a>.</p> <p>The companies we work with to provide you with targeted ads are required by us to give you the choice to opt out of receiving targeted ads. Most of these companies are participants of the Digital Advertising Alliance (“DAA”) and/or the Network Advertising Initiative (“NAI”). To learn more about the targeted ads provided by these companies, and how to opt out of receiving certain targeted ads from them, please visit: (i) for website targeted ads from DAA participants, <a href="https://www.aboutads.info/choices">https://www.aboutads.info/choices</a>; (ii) for app targeted ads from DAA participants, <a href="https://www.aboutads.info/appchoices">https://www.aboutads.info/appchoices</a>; and (iii) for targeted ads from NAI participants, <a href="https://www.networkadvertising.org/choices/">https://www.networkadvertising.org/choices/</a>. Opting out only means that the selected participants should no longer deliver certain targeted ads to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., in connection with the participants’ other customers or from other technology services).</p> <p>To opt out of us sharing your data with a third party as part of a customer list for Matched Ads, please contact us as set forth in the “Contact Us” section below and specify that you wish to opt out of Matched Ads. We will remove your data from any subsequent lists shared with third parties for Matched Ads. Alternatively, you may directly contact the applicable party to opt out.</p> <p>You may also limit our use of information collected from or about your mobile device for purposes of serving targeted ads to you by going to your device settings and selecting “Limit Ad Tracking” (for iOS devices) or “Opt out of Interest-Based Ads” (for Android devices).</p> <p>Please note that if you opt out using any of these methods, the opt out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt out options or programs, or the accuracy of any</p>

		<p>other entities' statements regarding their opt out options or programs.</p>
	<p>Communications</p>	<p>E-mails. You can opt-out of receiving promotional emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link. Please note that you cannot opt-out of non-promotional emails, such as those about your account, transactions, servicing, or our ongoing business relations.</p> <p>Please note that your opt out is limited to the email address and device used and will not affect subsequent subscriptions.</p> <p>Phone calls. You can opt-out of receiving phone calls at any time by requesting opt-out during any call you receive from us, or contacting us as set out below and specifying you can to opt-out of calls.</p>
	<p>For data subjects in Europe</p>	<p>It is important that you are familiar with and easily able to exercise the following rights –</p> <ul style="list-style-type: none"> <li>• <a href="#">The right to be informed your personal information being used (which is what this privacy notice is for).</a></li> <li>• <a href="#">The right to access your personal information.</a></li> <li>• <a href="#">The right to object to direct marketing.</a></li> <li>• <a href="#">The right to object to the use of your personal information.</a></li> <li>• <a href="#">The right to erasure of your personal information.</a></li> <li>• <a href="#">The right of data portability.</a></li> <li>• <a href="#">The right to have your personal information rectified if it is inaccurate.</a></li> <li>• <a href="#">The right to have use of your personal data restricted</a></li> </ul> <p>Please be aware that these rights are not always absolute and there may be some situations in which you cannot exercise them or they are not relevant. To help you understand how they work, we have provided links to the Information Commissioner's Office's guidance on each of the rights.</p> <p>To exercise any of your rights please contact us using the details below. If you are unhappy about how we have</p>



		<p>used your personal information or have any questions, please let us know. If we are not able to resolve your concerns or answer your questions, you have the right to complain to the Information Commissioner’s Office.</p> <p><b>EU Representative</b>  Tessian have appointed the following as our EU representative in accordance with Article 27 of the GDPR –</p> <p><b>Dr. Stefan Krempf</b>  Katharinenheimstrasse 3  D-83093 Bad Endorf  Tel: +49 175 221 4287</p>
	Account Information	Existing customers may access, update, or remove certain information that you have provided to us through your account by visiting your account settings. Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If you are a California resident please see the additional disclosures at the end of this policy. If you are a data subject in Europe please see the additional disclosures above.
<b>Children</b>		
<b>Children</b>	The Service is intended for general audiences, and is not directed at children. We do not knowingly collect personal information (as defined by the U.S. Children’s Privacy Protection Act, or “COPPA”) from children. If you are a parent or guardian and believe we have collected personal information in violation of COPPA, contact us at <a href="mailto:privacy@tessian.com">privacy@tessian.com</a> . We will remove the personal information in accordance with COPPA. We do not knowingly “sell,” as that term is defined under the CCPA, the personal information of minors under 16 years old who are California residents.	
<b>Data Security</b>		
<b>Data Security</b>	We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you. For personal data transferred from the United Kingdom, the European Union, and Switzerland, we	



	<p>will provide appropriate safeguards, such as through the use of standard contractual clauses.</p>
<h2>Changes to this Privacy Policy</h2>	
<b>Changes to this Privacy Policy</b>	<p>We may revise and reissue this policy at any time. When we update this policy, we take appropriate measures to inform you, consistent with the significance of the changes we make. If the changes are material, we will obtain your consent if and where this is required by applicable data protection laws. You can see when this policy was last updated by checking the “effective” date displayed at the top of this policy. We recommend that you review this policy regularly for any revisions.</p>
<h2>Contact Us</h2>	
<b>Contact Us</b>	<p>If you have any questions or comments about this policy, our data practices, or our compliance with applicable law, please contact us:</p> <p>By email: <a href="mailto:privacy@tessian.com">privacy@tessian.com</a></p> <p>By mail: (UK) 3 Finsbury Avenue London, EC2M 2PA United Kingdom</p> <p>(US) 200 Portland Street, 5<sup>th</sup> Floor, Boston, MA 02114</p> <p>This policy has been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information here, please contact us at <a href="mailto:privacy@tessian.com">privacy@tessian.com</a>.</p>
<h2>Additional Disclosures for Nevada Residents</h2>	
<p>Nevada consumers may submit requests directing a business not to sell certain kinds of personal information that the business has collected or will collect about the consumer. A sale under Nevada law is the exchange of personal information for monetary consideration by the business to a third party for the third party to license or sell the personal information to other third parties. If you are a</p>	





Nevada consumer and wish to submit a request relating to our compliance with Nevada law, please contact us as at [privacy@tessian.com](mailto:privacy@tessian.com).

## Additional Disclosures for California Residents

These additional disclosures apply only to California residents. The California Consumer Privacy Act of 2018 (“CCPA”) provides additional rights to know, delete and opt-out, and requires businesses collecting or disclosing personal information to provide notices and means to exercise rights. Our Service is intended to provide information and services to job applicants and business clients. You understand and agree that information collected about you is solely within the context of (i) your role as an employee, job applicant, owner, director, officer, or contractor or (ii) Tessian conducting due diligence regarding, or providing or receiving a product or service to or from your employer.

### Notice of Collection.

In the past 12 months, we have collected the following categories of personal information, as described in the CCPA:

- **Identifiers**, including name, postal address, email address, and online identifiers (such as IP address).
- **Customer records**, including phone number, billing address, and credit or debit card information.
- **Characteristics of protected classifications under California or federal law**, including gender.
- **Commercial or transactions information**, including records of products or services purchased, obtained, or considered.
- **Internet activity**, including browsing history, search history, and interactions with a website, email, application, or advertisement.
- **Geolocation data**.
- **Employment and education information**.
- **Inferences drawn** from the above information about your predicted characteristics and preferences.

For further details on information we collect, including the sources from which we receive information, review the information collection sections above. We collect and use these categories of personal information for the business purposes described in the use of information sections above, including to manage our Service.

We do not generally sell information as the term “sell” is traditionally understood. To the extent “sale” under the CCPA is interpreted to include the activities set out in this policy, such as those disclosed in the “Tracking technology, advertising, and analytics” section above, we will comply with applicable law as to such activity. We disclose the following categories of personal information for commercial purposes: identifiers, characteristics,



	<p>commercial or transactions information, internet activity, geolocation data, and inferences drawn. Please review the sharing of information sections above for further details about the categories of parties with whom we share information.</p>
<b>Right to Know and Delete.</b>	<p>We acknowledge that you may have rights under the CCPA in connection with the personal information we process on behalf of our customers. If personal information about you has been processed by us as a service provider on behalf of a customer and you wish to exercise any rights you have with such personal information, please inquire with our customer directly. If you wish to make your request directly to us, please provide the name of our customer on whose behalf we processed your personal information. We will refer your request to that customer, and will support them to the extent required by applicable law in responding to your request.</p>
<b>Right to Opt-Out.</b>	<p>To the extent Tessian sells your personal information as the term “sell” is defined under the CCPA, you have the right to opt-out of the sale of your personal information by us to third parties at any time. You may submit a request to opt-out emailing us at <a href="mailto:privacy@tessian.com">privacy@tessian.com</a>.</p>
<b>Authorized Agent.</b>	<p>You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent’s permission to do so and verify your identity directly.</p>
<b>Right to Non-Discrimination.</b>	<p>You have the right not to receive discriminatory treatment by us for the exercise of any your rights.</p>
<b>Shine the Light.</b>	<p>Customers who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties’ own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at the email or postal address set out in “Contact Us” above and specify that you are making a “California Shine the Light Request.” We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.</p>