



## TESSIAN PRIVACY NOTICE

(EFFECTIVE DATE 31 MARCH 2023)

<b>How Tessian processes personal information</b>	<p>This Privacy Notice is for people whose information, including personal information (as defined under privacy laws), is processed by or on behalf of Tessian Limited (<b>Tessian</b> or <b>we</b>). Personal information (which is also called personal data) means information about you or that could be used by itself, or in combination with other data, to identify you as an individual.</p> <p>Please read this Privacy Notice carefully to understand how we collect and use your information, including personal information, and, importantly, your rights and choices.</p> <p>For residents of California please see the Additional Disclosures for California Residents below.</p> <p>If you have any questions or wish to exercise your rights and choices, please contact us as set out in the “Contact Us” section.</p>
<b>Who we are</b>	<p>Tessian is a company registered in England and Wales with company number 08358482 and registered office at 15 Worship Street, London, EC2M 2PA, UK. We are registered with the UK 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 customers, which includes information in email communications sent by and to their employees, we aggregate personal information processed as part of our services and use it to improve our services. We also collect the personal information of people we work with and people who visit our websites or communicate with us through email and/or social media accounts and messaging services, including the chatbot on our tessian.com website.</p>
<b>People who use our websites or otherwise communicate with us</b>	
<b>What information we collect</b>	<p>When you visit our websites we collect the following information about your computer or device –</p> <ul style="list-style-type: none"><li>• 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></ul>



	<p>In relation to the IP address, we retain only location data derived from it, at the level required to identify the country from which you are visiting the website.</p> <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 websites (including date and time).</li><li>• Products you viewed or searched for.</li><li>• Page response times.</li><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 our <a href="#">cookie policy</a> for more information on information collected via cookies and other tracking technologies when you visit our website.</p> <p>If you complete one of our webforms or communicate with us by email or telephone, 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 that information.</p> <p>If you communicate with us through any of our social media pages or via any messaging services, we will also collect and use the information you share with us. For further information, please see the section below, titled “Information from Other Sources”.</p>
<p><b>What we use this information for</b></p>	<p>We do not use IP addresses for any purpose, except as described in this notice. We collect information about your computer or device and visit to our websites to optimise your visit and improve our services.</p> <p>If you contact us through our websites or by email, we will use your name, contact information and any other information you give us to respond to your query and provide you with any requested services.</p>

<p><b>Legal ground for our use of your personal information</b></p>	<p>Our legal ground for using the personal information we collect via our websites or from your email communications with us is that doing so is necessary for the purposes of the legitimate interests of our business. We always consider the rights and privacy of individuals before using their personal information for the purposes of our business.</p> <p>As noted in our <a href="#">cookie policy</a>, we process personal information collected via any non-essential cookies and similar technologies on the basis of your consent. 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, this applies 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><b>Sharing your information</b></p>	<p>We use a number of service providers to support our websites. We may share your personal information with these third parties, from time to time.</p> <p>For more information on these providers, please see our <a href="#">cookie policy</a>.</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>How long we keep your information</b></p>	<p>We keep information you provide to us via webforms or emails for the shorter of (i) the period needed to provide the service or to respond to the enquiry; or (ii) 7 years, except where you exercise your rights to opt out and/or to be forgotten.</p>
<p><b>Customers, prospective customers, suppliers and others 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 the employees and other personnel of customers, prospective 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 and business related meetings.</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>Information from other sources for marketing and lead generation</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, including Leandata, LeadIQ, ZoomInfo and Lusha.</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, sponsors and those we with at Tessian events, including webinars).</li> <li>• Publicly-available sources, including data in the public domain.</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> <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>• Visit our premises and are caught by CCTV.</li> <li>• Visit our websites (please see the ‘People who use our websites or contact us by email’ section of this notice).</li> </ul> <p>In addition, we may collect information concerning representatives of prospective customers from data brokers and partners (as detailed in the Information from Other Sources section below).</p>
<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 services.</li> </ul>



**Use of Other Service Providers**

We promote or offer parts of our services 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 services.

Some examples include:

- Links. Our services include links that hyperlink to websites, platforms, and other services not operated or controlled by us.
- Liking and Sharing. We may embed a pixel or SDK on our services 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.
- Brand Pages and Chatbots. 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 chatbot) is treated in accordance with this Privacy Notice. Also, if you publicly reference our services 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 services.

Please note that when you interact with other parties, including when you leave our services, 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, UK, U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

- Ensure our work is well targeted, relevant and effective.
- Market our services, including communications with you regarding events and promotions.
- Analyse and continually improve the services we offer and our websites.
- Keep our accounts, records and databases accurate and relevant.
- Support and manage our staff.
- Fulfil our legal obligations (including where required by regulators and official authorities).
- Exercise our legal rights (including in relation to legal proceedings).
- Prevent and address fraud, breach of policies or terms, and threats or harm.
- Conduct research, including focus groups and surveys.
- Improve our services and other Tessian websites, apps and marketing efforts.
- Fulfil any other purpose at your direction.



<b>Legal grounds for using your personal information</b>	<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 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.</p> <p>When we process your personal information for certain purposes, including direct marketing, our 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, this applies 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). 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>Sharing your information</b>	<p>We use a number of third parties, including IT, hosting and other service providers to support our business. We may share your personal information, with these providers, from time to time. If you would like more information about these organisations please contact us using the details below.</p> <p>The third parties we might share your personal information with include –</p>



- Clari Wingman and Salesloft – to capture voice analytics on sales and marketing calls.
- Salesforce (including ProvenWorks), Salesloft and LinkedIn – to manage our marketing, customer and business development information.
- Online platforms including Facebook and LinkedIn – to help us with advertising and marketing activities.
- Analytics related services providers such as Chili Piper, Clari and HighSpot – to better understand and manage sales related communications.
- Usergems – to ensure email data is kept up to date.
- Docusign – for the electronic signature of agreements

We may also share information with –

- Strategic partners for the purposes of providing our Services.
- Business partners, such as sponsors and those we work with in connection with conferences, webinars and other events.
- A company which is a member of our group.
- A third party that we work with where necessary for the purposes of granting you access to our websites.
- 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).
- 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).
- A selected third party that you consent to our sharing your information with for marketing purposes, as we refer to above.

In relation to sharing with sponsors and those we work with in connection with conferences and webinars, you will find relevant details about this subject and the partners involved, on the pages or materials relating to the particular event. You should read this before registering for the event. Treatment of shared information is governed by the privacy statements of our partners. We therefore recommend that you visit our partners' privacy-related pages.

Separately from our solely business purposes, we will also use your information where we have a legal obligation to do so. For example, this applies 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, our services, or anyone else.



<p><b>How long we keep your personal information</b></p>	<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>
<p><b>Employees of our customers and people who send emails to them</b></p>	
<p><b>What information we collect</b></p>	<p>Tessian's core services involve machine-scanning of inbound and outbound emails on behalf of our customers for cybersecurity threats and to pre-empt human error by real time alerts. In doing so Tessian is acting as a data processor or service provider. Most of the information we process is technical and not personal information, for example, information in the headers of emails. We also process a minimal amount of this information for a limited period for own purposes, which are limited to service improvement and improving our threat detection capabilities.</p>
<p><b>How we collect this information</b></p>	<p>The personal information we collect for our own purposes is limited to email addresses (which may contain the names or part of the names of individuals) and IP addresses. This information is hashed before it is used outside the confines of a customer contract.</p>
<p><b>What we use your information for</b></p>	<p>We use de identified, hashed data to build threat intelligence data repositories including data about existing or emerging threat actors. Threat intelligence may include, for example, IP addresses, URLs and domain names, links and the file names of attachments that contain or initiate malware. This information may also be used to improve the machine learning aspects of our services.</p>
<p><b>Legal grounds for using your personal information</b></p>	<p>Our legal ground for using the personal information we collect through our services is that doing so is necessary for the purposes of the legitimate interests of our business and that of our customers. We always consider the rights and privacy of individuals before using their 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><b>Sharing your information</b></p>	<p>We share data with service providers who perform services for us.</p> <p>Separately from our solely business purposes, we will also use your information where we have a legal obligation to do so. For example, this applies 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, our services, or anyone else.</p>
<p><b>How long we store personal information</b></p>	<p>The personal information derived from customers' email systems that Tessian controls when using it for threat intelligence is only kept for as long as is necessary to hash it. The hashed data used for threat intelligence is not subject to a fixed retention period and is kept for as long as Tessian considers that it provides useful intelligence.</p>



<b>Applicants</b>	
Where people apply for roles with Tessian, it will be necessary for us to use personal information for the recruitment process.	
<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 or resumés, 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 special categories 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 in compliance with and where permitted by applicable laws.</p>
<b>How we collect this information</b>	<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 the UK 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>
<b>What we use your information for</b>	<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 beliefs, or your 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>
<p><b>Legal grounds for using your personal information</b></p>	<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>
<p><b>If you fail to provide personal information</b></p>	<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>



<p><b>Sharing your information</b></p>	<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>• Checkr.</li> <li>• Tax authorities, such as HMRC in the UK, 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 information for specific purposes in accordance with our instructions and not for their own purposes.</li> </ul>
<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 12 months 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 what is stated elsewhere in this Privacy Notice, we may use and share information that does <i>not</i> identify you (including information that has been aggregated or de-personalised) 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>International Transfers</b></p>	
<p>We transfer personal information outside of the EEA and the UK. When personal information is transferred internationally, we are required to ensure you are afforded equivalent protection in respect of your personal information to that provided in the EEA and the UK.</p>	



We generally do this by putting in place appropriate safeguards when making international transfers, for example, by using specific contractual clauses which have been approved by the European Commission or transfer mechanisms approved by the UK government together with supplementary measures if we deem it necessary in the circumstances.

## Your rights and managing your information

<p><b>Your rights and managing your information</b></p>	<p>Do Not Track</p>	<p>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” 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> . 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 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 that you wish to opt-out of calls.</p>
	<p>Personal Information Requests</p>	<p>We also offer you choices that affect how we handle the personal information that we process. Depending on your location and the nature of your interactions with our services, you may request the following in relation to personal information:</p> <ul style="list-style-type: none"> <li>• <b>Information</b> about how we have collected and used personal information. We have made this information available to you without having to request it by including it in this Privacy Notice.</li> <li>• <b>Access</b> to a copy of the personal information we hold about you.</li> <li>• <b>Correction</b> of personal information that is inaccurate or out of date.</li> </ul>

	<ul style="list-style-type: none"><li>• <b>Deletion</b> of any personal information that we no longer need to provide our services or for other lawful purposes.</li><li>• <b>Opt out</b> of the selling of your personal information or use of your personal information for interest-based advertising. We do not generally sell information as the term “sell” is traditionally understood. We share information with third-party advertising partners and allow them to collect information about your visit to our website using cookies and other tracking technologies as described in our Cookie Policy. Our disclosure of information to these partners may be considered a “sale” or “sharing” of personal information or “targeted advertising” under applicable laws. You can opt out of these disclosures and limit our use of tracking technologies as described in our <a href="#">Cookie Policy</a>.</li><li>• Receive any personal information we hold about you <b>in a structured and commonly used machine readable format</b> or have such personal information transmitted to another company.</li><li>• <b>Withdraw any consent</b> you previously provided to us regarding the processing of your personal information at any time. We will apply your preferences going forward. This will not affect the lawfulness of the processing before you withdrew your consent.</li><li>• <b>Additional rights</b>, such as to <b>object</b> to direct marketing or to the use of your personal information, or to have use of your personal information restricted.</li></ul>
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		<p>To make a request, please email us or write to us as provided in the “Contact us” section below. We may ask for specific information from you to help us confirm your identity. Depending on where you reside, you may be entitled to empower an authorized agent to submit requests on your behalf. We will require authorized agents to confirm their identity and authority, in accordance with applicable laws. You are entitled to exercise the rights described above free from discrimination.</p> <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. If you reside in the UK, to help you understand how they work, we suggest that you look at the Information Commissioner’s Office’s guidance at <a href="https://ico.org.uk">https://ico.org.uk</a>.</p> <p>If you are unhappy about how we have 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, depending on where you reside, such as if you reside in the EEA or the UK, you have the right to complain to a data protection regulator where you live or work, or where you feel a violation has occurred. For example, if you are based in the UK, you may choose to lodge a complaint with the Information Commissioner’s Office at <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>.</p>
	Account Information	<p>If you are an existing customer, you 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.</p>
<p><b>Children</b></p>		



<b>Children</b>	<p>Our services are intended for general audiences, and are 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.</p>
<b>Data Security</b>	
<b>Data Security</b>	<p>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 will provide appropriate safeguards, such as through the use of standard contractual clauses.</p>
<b>Changes to this Privacy Notice</b>	
<b>Changes to this Privacy Notice</b>	<p>We may revise and reissue this Privacy Notice at any time. When we update this Privacy Notice, 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 as required by applicable data protection laws. You can see when this Privacy Notice was last updated by checking the “Effective Date” displayed at the top of this Privacy Notice.</p>
<b>Contact Us</b>	
<b>Contact Us</b>	<p>If you have any questions or comments about this Privacy Notice, our data practices, or our compliance with applicable law, please contact us: By email: <a href="mailto:privacy@tessian.com">privacy@tessian.com</a></p> <p>By mail: (UK) 4th floor, 15 Worship St, London EC2A 2DT (US) 200 Portland Street, 5<sup>th</sup> Floor, Boston, MA 02114</p> <p><b>EU Representative</b> Tessian has appointed the following as our EU representative in accordance with Article 27 of the GDPR. – <b>Dr. Stefan Krempf</b> Katharinenheimstrasse 3D- 83093 Bad Endorf Tel: +49 175 221 4287</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 California Residents</h2>	
<p>These additional disclosures apply only to California residents. The California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act 2020) (“CCPA”) requires businesses collecting or disclosing personal information to provide privacy notices regarding the business’ collection, use, and disclosure of personal information and the privacy rights and choices California residents may have in how their personal information is processed.</p>	
<p><b>Notice of Collection</b></p>	<p>In the past 12 months, we have collected the following categories of personal information, as described in the CCPA:</p> <ul style="list-style-type: none"><li>● <b>Identifiers</b>, including name, postal address, email address, and online identifiers (such as IP address).</li><li>● <b>Customer records</b>, including phone number, billing address, and credit or debit card information.</li><li>● <b>Characteristics of protected classifications under California or federal law</b>, including gender.</li><li>● <b>Commercial or transactions information</b>, including records of products or services purchased, obtained, or considered.</li><li>● <b>Internet activity</b>, including browsing history, search history, and interactions with a website, email, application, or advertisement.</li><li>● <b>Geolocation data</b>.</li><li>● <b>Employment and education information</b>.</li><li>● <b>Inferences drawn</b> from the above information about your predicted characteristics and preferences.</li></ul> <p>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 services.</p> <p>We disclose the following categories of personal information for commercial purposes: identifiers, characteristics, 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>Rights</b>	<p>Please read the “Personal information requests” section above to learn about the choices we offer you in relation to the personal information we hold.</p> <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>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>