



# Mert Consulting Data Privacy Policy

## 1. Our Privacy Policy

**Mert Consulting may modify this Privacy Policy as needed. This Privacy Policy is effective as 15 October 2023.**

Mert Consulting reserves the right to modify this Privacy Policy as needed, for example to comply with evolutions in laws, regulations, Mert Consulting practices and procedures, or requests by supervisory authorities.

In this case, Mert Consulting will inform impacted individuals of material changes in this Privacy Policy. Mert Consulting will post new versions on relevant internal and external websites and digital platforms.

The main changes and reasons for changes between the current version of this Privacy Policy and the previous version are the following:

- Consistent wording across Mert Consulting digital platforms and increased transparency on data processing and protection practices;
- Specifying in our Cookie Notice examples of cookies and similar technologies we use.

## 2. Why this Privacy Policy?

**Mert Consulting is committed to protecting your privacy and personal information. This Privacy Policy informs you of our privacy practices and of how personal information is protected. You should read it before accessing Mert Consulting digital content.**

Mert Consulting strongly supports the fundamental rights to privacy and data protection as well as compliance with national and international privacy laws.

This Privacy Policy describes how Mert Consulting processes and protects personal information of individuals who use our websites and other digital platforms as well as in the context of our offline business activities.



Mert Consulting has adopted an internal Global Data Privacy Policy which is applicable to our company or subsidiaries for the collection, processing, use, dissemination, transfer and storage of personal information. It imposes common rules for all of our subsidiaries of all countries and aims at ensuring a high level of protection of personal information within Mert Consulting

### **3. What is the scope of this Privacy Policy?**

**This Privacy Policy applies to all Mert Consulting subsidiaries and digital content, unless a specific privacy notice has been released to supplement it or to replace it. You should check the privacy notices made available to you on each digital platform such as websites or applications.**

This Privacy Policy describes how Mert Consulting processes and protects personal information of consumers and professionals with whom we do business online and offline, such as the individuals who use our websites and other digital platforms as well as in the context of our consumer products.

If you have applied for employment with Mert Consulting, the personal information submitted with your job application will be used for recruitment and other customary human resources purposes as specified in the applicable privacy statement provided in our Career Center.

Mert Consulting is a US company, with legal entities, business processes, management organizations, and system infrastructure that cross borders. This Privacy Policy applies to all Mert Consulting data processing activities run by our company, including product and service offerings and digital content (e.g. event registrations, websites, applications, tutorials, e-trainings, newsletters, advertising, and other communication). It may however be supplemented by a more specific privacy notice/statement/policy or even superseded by another policy, specific to a particular Mert Consulting program, product, service, content or entity. It is important that you read the statements made available to you for your full information. For instance, the processing of job candidate applications is governed by the privacy notice posted on our Career Portal.

The data controllers of the data processing activities are the Mert Consulting who have determined the data processing means and purposes. They may vary on a case-by-case basis.



This Privacy Policy binds all Mert Consulting controlled the future companies or subsidiaries and their employees.

Any order made by you online is also subject to the terms and conditions provided on the relevant sites. You must read them.

#### **4. Why do we collect and use personal information?**

**We use personal information for various purposes, including to fulfill orders and requests, to manage customer and prospect relationships, conduct surveys, improve our products, services, digital content, our websites and mobile applications as well as user journeys, manage user accounts and programs, analyze activities on our digital platforms, run marketing activities such as online targeting and advertising, provide user with contextual and relevant information, ensure the security of our activities, finance and quality control, trainings, reporting's and analytics, protect against fraud, and, more generally, run our business activities.**

Our primary goal in collecting information is to provide you with superior service and a smooth, efficient and personalized experience while using our digital content.

You can find more information in section 7.

#### **5. What type of personal information do we process?**

**Mert Consulting processes various types of personal information including identity and contact related information, professional related information, information about preferences, interactions with us, financial related information, online traffic data and the content you provide to us. In most instances this information is obtained from customers, partners and users. We also purchase lists from marketing agencies and obtain information from our partners, through Cookies and social networks.**

Personal information (also called personal data) is any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

This Privacy Policy does not cover personal information rendered anonymous, that is if individuals are no longer identifiable or are identifiable only with a disproportionately large



expense in time, cost, or labor. If anonymized data becomes identifiable, then this Privacy Policy shall apply.

In most instances we collect personal information directly from users who have a business relationship with us. We may also obtain information through a reseller or a business partner, by purchasing customer lists from marketing agencies, from your online browsing experience, from social networks when you connect with these network's credentials and through Cookies.

You can find more information in section 7.

## **6. Why do we disclose personal information to others?**

**We disclose personal information to other Mert Consulting or future subsidiaries and to our suppliers, advertising and marketing agencies, with social networks if you use their login credentials, with other companies if you register with Mert Consulting credentials, competent regulatory bodies and authorities and business successors.**

Mert Consulting provide the best service to customers, prospects and users, personal data may be accessed by personnel working for different entities. It may be the case, for example, for customer relationship management, sales or product support, marketing, product development purposes, improvement of the products, services and digital content, data quality checks, or security, finance, regulatory and compliance purposes.

We resort to supplier to carry out data processing activities and to provide our products, services and online content to you. These suppliers include, without limitation, providers of hosting facilities, information systems, advertising and marketing agencies, IT support, security services, financial services, carriers who deliver products, outside accounting firms, lawyers and auditors.

We ensure all suppliers working under contract for Mert Consulting are compliant with data privacy laws and aligned with Mert Consulting guidelines.

We also disclose personal information as follows:

- In connection with the provisions of our products and services, we may disclose personal information to (and receive personal information from) those partners that provide product or service functionality. For example, we may partner with companies to integrate smart



home functionality into our smart home hardware products. These disclosures are necessary for you to utilize the products and features.

- In connection with the provision of advertising, we may share some limited personal information (e.g. device identifiers, Cookie identifiers) with ad exchanges or agencies that manage advertising on third-party websites and apps on which you may see advertising. You can restrict this sharing by exercising your Privacy Choices.

You may access our digital content and/or register through login credentials of third-party websites (such as Facebook and LinkedIn). If you do so, we will be able to access some of the information you registered on these social networks, to assist you to pre-fill the registration form for Mert Consulting digital content. By using the login credentials of these third-party websites, you may at the same time inform your contacts on these sites that you have created an account with Mert Consulting. If you want to know more about the information accessible by your contacts on these sites and how to restrict their communication, we encourage you to read their terms of use and privacy policies.

- Mert Consulting may disclose your personal information as necessary to potential buyers and successors in title, to facilitate a merger, consolidation, transfer of control or other corporate reorganization in which Mert Consulting participates.

- In other ways described in this Privacy Policy or to which you have otherwise consented.

- Aggregated with other information, in such a way that your identity cannot reasonably be determined (for example, statistical compilations).

You can find more information in section 7.

We will not sell or rent your personal information for monetary consideration to a third party without your permission.

## **7. Categories of personal information, purposes and disclosures**

### **Category of personal information, representative data elements and sources:**

#### **Contact Information**

- Name
- Username
- Mailing address
- Email address



- Telephone number
- Mobile number

We collect this type of information from:

- You
- Third parties, such as companies that help us maintain the accuracy of our data and data aggregators that help us complete and enhance our records

We may obtain business contact information from data aggregators and other entities services, such as LinkedIn, event and trade shows, and our commercial customers.

### **Purpose for collecting and sharing the PI**

We use this type of information to identify you and communicate with you, including:

- To send transactional/operational messages (such as confirmations, or delay in deliveries)
- To register and manage your account
- To send marketing communications, surveys (satisfactory and marketing), and invitations to our digital/physical events
- To support corporate transactions or reorganizations
- To personalize our communications and provide customer service
- For our Everyday Business Purposes

### **Categories of entities to whom this type of personal information is disclosed for a business purpose:**

We may disclose this type of information to our future Subsidiaries and to Service Providers, including to social media companies that use the data only to identify which of our customers use their platforms so that we can deliver ads to you on the platform.

- Companies that deliver our communications, such as the postal service and couriers
- Companies that assist us with address hygiene and fulfillment
- Other entities as required by law

## **Relationship information**

We collect personal information about business professionals associated with our commercial customers, suppliers and partners in the context of our relationships we have with these companies. This includes:

- Information about your authority to use our products and place orders with us
- Professional interests and credentials
- Relationship information, including marketing and communication preferences
- Business interests and preferences (product, contact, marketing)
- Opportunity information (description, category, stage...)
- Visitor logs
- Loyalty and rewards program data
- Household demographic data, including census data
- Data from social media profiles

We collect this type of information from you and from your company. We may receive your data from other entities, such as trade associations or trade shows.

## **We use this type of information:**

- To fulfill our business relationship with you and/or our client
- To develop and maintain our relationship with you and our client, including sending your marketing communications as permitted by law and subject to your preferences
- To better understand you and to understand our customers generally
- For product and service development and improvement
- To identify prospective customers
- For internal business purposes, such as finance, quality control, training, reporting and analytics
- For risk management, fraud prevention and similar purposes
- For recordkeeping and compliance, including dispute resolution



**We may disclose this type of information to our company or subsidiaries and Service Providers and to:**

- Companies with whom we have joint marketing and similar arrangements
- Companies as needed to complete the transaction, including delivery companies, agents and manufacturers
- Our lawyers, auditors and consultants
- Customers, in connection with their audits of Mert Consulting
- Other entities as required by law

**Online & Technical Information**

- IP Address
- Device identifiers and characteristics
- Advertising ID
- Web Server Logs
- First Party Cookies
- Third Party Cookies
- Web beacons, clear gifs, pixel tags
- Server log records
- Activity log records

We collect this type of information from:

- You and from your computer or devices when you interact with our platforms, websites and applications. For example, when you visit our websites, our server logs record your IP address and other information.
- Automatically, via technologies such as cookies, web beacons, when you visit our website or other websites.
- Third parties, including computer security services and advertising partners

We also associate information with you using unique identifiers collected from your devices or browsers.



**We use this type of information:**

- For system administration, technology management, including optimizing our websites and applications,
- For information security and cybersecurity purposes, including detecting threats
- For recordkeeping, including logs and records that maintained as part of Transaction Information
- To better understand our customers and prospective customers and to enhance our Relationship Information, including by associating you with different devices and browsers that they may use
- For online targeting and advertising purposes
- For our Everyday Business Purposes

**We may disclose this type of information to our Company, Subsidiaries and Service Providers including to companies such as Google that use the data collected by cookies and similar means to help us with our online advertising programs, and to:**

- Companies that assist with our information technology and security programs, including companies such as network security services who retain information on malware threats detected
- Companies that assist with fraud prevention, detection and mitigation
- Third party network advertising partners
- Our lawyers, auditors and consultant
- Other entities as required by law

We also disclose this information with third parties if we have your consent to place third party advertising cookies. To learn more and review your cookie settings, please read our Cookie Notice.

**Compliance data**

We collect this type of information from:



- Compliance program data, such as records maintained to demonstrate compliance with applicable laws
- Product safety data and other regulatory information
- Records related to consumer preferences, such as your opt-ins and opt-outs of marketing programs
- Records related to CCPA rights requests

We collect this type of information from:

- You
- Third parties, including companies that help us conduct internal investigations
- Third parties, such as consumer reporting agencies and data aggregators who conduct background screening for us

**We use this type of information:**

- To comply with and demonstrate compliance with applicable laws
- For legal matters, including litigation and regulatory matters, including for use in connection with civil, criminal, administrative, or arbitral proceedings, or before regulatory or self-regulatory bodies, including service of process, investigations in anticipation of litigation, execution or enforcement of judgments and orders
- For internal business purposes, such as risk management, audit, internal investigations, reporting, and analytics
- For our Everyday Business Purposes

**We may disclose this type of information to our Subsidiaries and Service Providers and to:**

- Our lawyers, auditors and consultants.
- Regulators, customers and other third parties, in connection with their audits of Mert Consulting
- Other entities (including government agencies, courts and opposing law firms, consultants, process servers and parties to litigation) in connection with legal matters

## 8. Your content

**You may choose to contribute content, including photos or comments, to online forums, applications or other digital platforms operated by Mert Consulting. Your content must be harmless. It must respect the law, the rights and interests of others. You need to have obtained consent before sharing someone else's data. You should apply caution before sharing information in a forum.**

The content provided to us must respect the rights and interests of others, including their rights to protection of personal information and privacy. It should not be offensive, disrespectful or be harmful in any way.

Any provision of personal information to Mert Consulting about another individual must be compliant with privacy laws, including with notice and consent requirements for the disclosure of that information.

While Mert Consulting strives to protect your personal information, providing it online on shared forums is not risk-free. If you post, comment, indicate interest, or share personal information, including photographs, to any forum, social network or blog, please be aware that any personal information you submit can be read, viewed, collected, or used by other users of these forums, and could be used to contact you, send you unsolicited messages, or for purposes that neither you nor Mert Consulting have control over. Mert Consulting is not responsible for the personal information you choose to submit in these forums. You should apply caution before deciding to share information about yourself or another person.

## 9. How do we protect personal information?

**Mert Consulting complies with widely recognized key data protection principles (fairness, purpose limitation, data quality, data retention, compliance with individuals' rights, security) and takes reasonable measures for the security of personal information.**

Mert Consulting respects the privacy rights and interests of individuals. Mert Consulting and its subsidiaries observe the following principles when processing personal information:

1. Processing personal information fairly and lawfully;
2. Collecting personal information for specified, legitimate purposes and not processing it further in ways incompatible with those purposes;
3. Collecting personal information which is relevant to and not excessive for the purposes for which it is collected and used. We may render information anonymous when feasible and appropriate, depending on the nature of the data and the risks associated with the intended uses;

4. Maintaining accurate personal information, and where necessary, kept up-to-date. We will take reasonable steps to rectify or delete information that is inaccurate or incomplete;
5. Keeping personal information only as long as it is necessary for the purposes for which it was collected and processed;
6. Processing personal information in accordance with individuals' legal rights;
7. Taking appropriate technical, physical, and organizational measures to prevent unauthorized access, unlawful processing, and unauthorized or accidental loss, destruction, or damage to personal information;
8. When processing sensitive personal information, ensuring appropriate notice and consent or that the processing otherwise complies with applicable law;

Mert Consulting and all its subsidiaries must ensure that the above principles are complied with.

Mert Consulting and its subsidiaries are committed to taking commercially reasonable technical, physical, and organizational measures to protect personal information against unauthorized access, unlawful processing, accidental loss or damage, and unauthorized destruction. We offer the use of secure servers to enable you to place orders or to access your account information. We implement access control measures for our internal systems that hold personal information. Authorized users are given access to such systems through the use of a unique identifier and password. Access to personal information is provided to our staff for the sole purpose of performing their job duties. We sensitize our employees on proper use and handling of personal information. We also require our service providers to maintain compliant security measures. We implement security measures to determine the identity of registered users, so that appropriate rights and restrictions can be enforced for these users. In case of a registered user, we use both log ins and passwords for authentication. You are responsible for maintaining the security of your log-in credentials.

Mert Consulting will retain your personal information for as long as the information is needed for the purposes for which it was collected and for any additional period that may be required or permitted by law, such as for business, legal, accounting, or reporting requirements. The length of time your personal information is retained depends on the purpose(s) for which it was collected, how it is used, and the requirements to comply with applicable laws, regulations or contracts.

More precise information is provided in privacy notices applicable to specific digital content. In general data retention periods are determined taking into consideration:

- The duration of our relationship (e.g., contract performance duration, account de-activation, your legitimate need to be recognized when contacted by us)
- Legal requirements for keeping data
- Statute of limitations

For marketing purposes, we keep relevant customer data for three years after the end of our relationship or since the last interaction with us.

By using our digital content or providing personal information to us, you agree that we may communicate with you electronically or otherwise about related security, privacy, use and administrative activities.

In spite of our efforts to implement appropriate security measures, online browsing carries inherent risks and we cannot guarantee that it is risk-free.

## **10. Third-party websites and social media**

**You should read the privacy policy of third-party websites and social media and adjust privacy settings as you see fit. Non-Mert Consulting websites and platforms are not covered by this Privacy Policy.**

Mert Consulting digital platforms may provide links to third-party applications, products, services, or websites for the user convenience and information. If you access those links, you will leave the Mert Consulting digital platform. Mert Consulting does not control those third-party sites or their privacy practices, which may differ from Mert Consulting practices. We do not endorse or make any representations about third-party sites. The personal information you choose to provide or that is collected by, these third parties are not covered by the Mert Consulting Privacy Policy. We encourage you to review the privacy policy of any site you interact with, before allowing the collection and use of your personal information.

We also provide social media links that enable you to share information with your social networks and to interact with Mert Consulting on various social media sites. The use of these links may result in the collection or sharing of information about you. We encourage you to review the privacy policies and the privacy settings of the social media sites with which you interact to make sure you understand the information that may be collected, used, and shared by those sites and to adjust these settings as you see fit.

## **11. Your Privacy Choices**

**Mert Consulting will comply with your data protection rights as applicable, including your rights to request access to your personal information and to request that it be deleted or amended. You can always opt out of any direct marketing activity performed by Mert Consulting**

This section tells you how to exercise your data protection rights, as applicable under relevant data protection laws, with respect to the personal information that we collect for our own business purposes. If we are processing your information as a service provider for another company, you will need to contact that company to exercise your rights:

- **Access requests.** You have the right to request a copy of the personal information that Mert Consulting maintains about you.

- **Correction requests.** You have the right to request that we update or correct your personal information. We will process your request as required by law.
- **Deletion requests.** You have the right to request that we delete or anonymize your personal information. We will process your request as required by law. Please understand that Mert Consulting cannot delete personal information in those situations where our retention is required for our Mert Consulting internal business purposes or otherwise permitted by law (such as for fraud prevention or legal compliance).
- **Inquiries and complaints.** You have the right to ask us about our privacy practices or to lodge a complaint if you believe that we have violated your privacy rights or failed to properly secure your personal information. To exercise these rights, please email your specific question or concern to [contact@mertconsulting.com](mailto:contact@mertconsulting.com)
- **Right to Opt-Out .** Subject to applicable laws, you have the right to opt out of certain types of processing, including:
  - to opt-out of the “sale” (as such term is defined under applicable law) of your personal information. However, Mert Consulting does not sell your personal information for monetary consideration.
  - to opt-out of online targeted advertising and the “sharing” of personal information for cross-contextual behavioral targeting.
  - to opt-out of any processing of personal information for purposes of making decisions that produce legal or similarly significant effects. However, Mert Consulting does not use any profiling or automated decision-making tools that significantly affect individuals. You would be given notice of any such activity.
  - to opt-out of emails, click the link labeled “unsubscribe” at the bottom of any email we send you or to revoke permissions that you may have given to send text messages, text STOP in response to any message.

If you have more than one email address or if you have changed your email address, please email [contact@mertconsulting.com](mailto:contact@mertconsulting.com) for assistance with changing your marketing preferences. Also, please note that even if you opt-out of commercial emails, we may still need to contact you with important transactional/operational information in relation to our relationship.

- **Limit the use of your sensitive personal information:** California residents have the right to limit secondary uses and disclosures of sensitive personal information. In general, Mert Consulting only uses and discloses sensitive personal information as needed to fulfill the purpose for which it was collected. However, if you have provided sensitive personal information to us, you may ask us to delete it using the process above.

In some cases, we may need to contact you to verify your identity and to obtain documentation to support your request.



Our websites also recognize Global Privacy Control signals if you are based in California or Virginia and will respect your opt-out request if it provided by your browser

**California residents: please read the Important Information for California Residents for specific information about your California Privacy Rights and for alternative methods for submitting California Privacy Rights requests.**

Country-specific sections may supplement this section.

## **12. Important information for California residents**

Mert Consulting in the USA is providing this supplemental privacy notice to give California residents the additional information required by the California Consumer Privacy Act (the “CCPA”).

Mert Consulting is primarily focused on serving business and professional customers, however, do collect consumer data from individuals who provide it to us via our online forms or by otherwise interacting with our websites or apps. We also receive consumer data in connection with our smart home products. This supplemental privacy notice explains how we comply with the CCPA for consumer and business professional information.

### **12.1 CCPA Rights**

The CPRA provides California residents with specific privacy rights:

- The right to know what personal information and sensitive personal information we collect.
- The right to access your personal information.
- The right to correct inaccurate personal information.
- The right to request that we delete your personal information.
- The right to know what categories of personal information are sold to third parties and to opt-out of that sale.
- The right to know what categories of personal information are shared with third parties for cross-contextual behavioral targeting and to opt-out that sharing.
- The right to limit the use and disclosure of sensitive personal information, and
- The right not to be retaliated against for exercising your privacy rights.

### **12.2 How to Exercise Your Privacy Choices?**

If you are a US resident, you may exercise your rights or authorize another person to act on your behalf by:

- Calling Mert Consulting at XXX-XXXXXXXXXXXX
- Emailing us: [contact@mertconsulting.com](mailto:contact@mertconsulting.com)



Please note that we will need to verify your identity before we can fulfill your request. Because the information that we maintain subject to CCPA generally consists of marketing information, we will generally verify your identity using your email address. We will respond to requests using the email address that is associated with the information we maintain.

If you are exercising CPRA access or deletion rights on behalf of another person, please understand that what will need to verify your authority with the person you seek to represent.

Please understand that your rights are subject to some limitations. If you request that we delete your personal information, we will do so except in those situations where our retention is required for our internal business purposes, to finalize the ongoing business operations we have with you, to log your request or otherwise permitted by CCPA (such as for fraud prevention or legal compliance). In these situations, we will retain your information in accordance with our records retention program and securely delete it at the end of the retention period.

Additionally, please note that many companies sell and install Mert Consulting products or services. We do not operate these companies, and we do not have any access to their databases. If you have registered with or purchased Mert Consulting products or services from another company, please contact that company directly to exercise your CCPA rights.

### **12.3 Financial Incentives**

Mert Consulting could collect personal information in order to deliver offers and promotions and to enable loyalty programs. While we cannot calculate the precise value of your information to us, our offers and incentives generally reflect the value of the relationships that we have with the individuals who participate in the program.

We will not discriminate against you if you exercise your rights under CCPA. However, if you ask us to delete your information, you will not be able to receive additional offers or promotions. Any offers or promotions sent to you previously will continue to be honored according to their original terms.

### **12.4 Sensitive Personal Information**

Mert Consulting uses and discloses the following categories sensitive personal information. We do not process any sensitive personal information for the purpose of informing characteristics about you.

We do not collect other categories of sensitive personal information, such as biometric identifiers, the contents of mail, email or texts, or other non -public information about your race, ethnicity, health, sex life or sexual orientation.

*1. Personal information of children under 16 cannot be sold or shared without affirmative consent.*



*2. Mert Consulting or Subsidiaries are companies that are directly or indirectly controlled by Mert Consulting*

*3. **Everyday Business Purposes** encompasses the Business Purposes (as defined in the CCPA) and following related purposes for which personal information may used:*

- To provide the information, product or service requested by the individual or as reasonably expected given the context in which with the personal information was collected (such as customer credentialing, providing customer service, personalization and preference management, providing product updates, bug fixes or recalls, and dispute resolution);*
- For identity and credential management, including identity verification and authentication, and system and technology administration.*
- To protect the security and integrity of systems, networks, applications and data, including detecting, analyzing and resolving security threats, and collaborating with cybersecurity centers, consortia and law enforcement about imminent threats.*
- For fraud detection and prevention;*
- For legal and regulatory compliance, including all uses and disclosures of personal information that are required by law or reasonably needed for compliance with company policies and procedures, such as: anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines;*
- For corporate audit, analysis and reporting;*
- To enforce our contracts and to protect against injury, theft, legal liability, fraud or abuse, and to protect people or property, including physical security programs;*
- To de-identify the data or create aggregated datasets, such as for consolidating reporting, research or analytics;*
- To make back-up copies for business continuity and disaster recovery purposes; and*
- For corporate governance, including mergers, acquisitions and divestitures.*

