

Overview Table

Categories of Personal Information	Method of Collection	Uses	Legal Basis	Categories of Third-Party Recipients	Retention*
Personal Information of an End Customer	Received from an E6 client who provides services to the End Customer, or that client's service provider Received from the End Customer directly in a request or complaint	Performing our contractual obligations under our agreements with the respective client	Your consent to the use of your Personal Information by the client for purposes of providing financial services to you, including disclosure to E6 as an authorized outsourced service provider	Subprocessors authorized by the client as part of the outsourcing arrangement with E6, including other companies in the E6 group; locations of subprocessors may vary depending on the region of the client's card program. [†] Categories of third-party subprocessors include cloud-hosted infrastructure and (where applicable) 3DS authentication services.	For the length of time required by our agreement with the respective client (typically at least 7 years)
		When responding to your request or complaint: • Locating your Personal Information subject to your request • Verifying your identity to ensure the security of your Personal Information • Reasonably fulfilling your request or explaining why it cannot be fulfilled, or can be fulfilled only in part • Demonstrating compliance with applicable data protection laws and defending ourselves against legal claims	Your consent Compliance with our legal obligations Our legitimate interest in defending ourselves against legal claims	The E6 client providing services to you Cloud-hosted communications platform Cloud-hosted storage platform Cloud-hosted project management platform Legal counsel (where applicable) EU designated representative (where applicable) Supervisory authorities (where applicable) Other companies in the E6 group	Up to 12 months following completion of responding to your request, except where we need to store this information for longer in order to demonstrate compliance with applicable law or to defend against legal claims, in which case these records may be retained for up to 7 years following final adjudication of legal claims, or longer where required by applicable law. Where a shorter period of time is sufficient to demonstrate compliance with applicable law and no legal claims are anticipated, we will delete your information as soon as this purpose is fulfilled.

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Your name, company name, job title, and contact details (if you are not an End Customer)	Submitted by you as a request for more information about our company, products and services, either via the form on our Website or through a request to a member of E6 staff	Providing marketing information about our company, products and services that you have requested	Your consent	Cloud-hosted customer relationship management platform Cloud-hosted communications platform	Up to 12 months after you inform us that you do not want us to contact you (including by clicking the Unsubscribe link in one of our emails), so that we have a record of your preference; or up to 12 months following your last known interaction with E6 communications, E6 Events, Websites, or personnel **
		Sending additional marketing communication, such as our newsletter, based on your interest	Our legitimate interest in marketing our products and services to individuals we believe may be interested	Cloud-hosted storage platform Fulfillment services	
		If your company becomes a customer of E6, sending business communications for purposes of entering into or performing a contract	Our legitimate interest in entering into and performing contracts with our customers	Other companies in the E6 group	
Your name, company name, job title, and contact details (if you are not an End Customer)	Submitted by you to register for our webinars or to download our e-books and other online content	Providing marketing information about our company, products and services, if you have agreed to this use at the time of registration	Your consent	Cloud-hosted customer relationship management platform Cloud-hosted communications platform Cloud-hosted storage platform Fulfillment services Other companies in the E6 group	Up to 12 months after you inform us that you do not want us to contact you (including by clicking the Unsubscribe link in one of our emails), so that we have a record of your preference; or up to 12 months following your last known interaction with E6 communications, E6 Events, Websites, or personnel **
Your name, company name, job title, and contact details (if you are not an End Customer)	Acquired from a third party that has received your consent to share your contact details, from a third party that has produced an E6 Event you registered for, or from a web page indexed by an Internet search engine	Providing marketing communications, including our newsletter, about our company, products and services	Our legitimate interest in marketing our products and services to individuals we believe may be interested	Cloud-hosted customer relationship management platform Cloud-hosted communications platform Cloud-hosted storage platform Fulfillment services	Up to 12 months after you inform us that you do not want us to contact you (including by clicking the Unsubscribe link in one of our emails), so that we have a record of your preference; or up to 12 months following your last known interaction with E6 communications, E6 Events, Websites, or personnel **
	Submitted by you to enter a prize drawing held by E6	Drawing a prize winner at random, and delivering the prize to you if you win Providing marketing communications, including our newsletter, about our		Other companies in the E6 group	

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		company, products and services			
Your interactions with marketing communications we have sent to you	Collected by a tracking pixel in marketing emails that we send out, including our newsletter; collected from unique tracking URLs in our marketing communications; or information logged by a third-party platform about your interactions with our marketing content sent to you via that third party	Optimization of marketing messaging and generating sales leads Enabling us to infer when recipients may not be interested in receiving further marketing communications from us Combining information about which content you interact with, which links you click, and information from analytics and advertising cookies placed by our Websites to draw inferences about your interests; and combining with similar information about other people at your company to build a profile of topics of interest to your business	Our legitimate interest in marketing our products and services to individuals and companies we believe may be interested	Cloud-hosted customer relationship management platform Other companies in the E6 group	Up to 12 months after you inform us that you do not want us to contact you (including by clicking the Unsubscribe link in one of our emails), so that we have a record of your preference; or up to 12 months following your last known interaction with E6 communications, E6 Events, Websites, or personnel **
Your IP address and associated location information, and your device fingerprint	Logged automatically when you visit our Websites or access our webinars and other online content	Detecting and preventing cyber attacks	Our legitimate interest in deterring, preventing, and investigating cyber attacks	Cloud-hosted customer relationship management platform	Up to 12 months after you inform us that you do not want us to contact you (including by clicking the Unsubscribe link in one of our emails), so that we have a record of your preference; or up to 12 months following your last known interaction with E6 communications, E6 Events, Websites, or personnel **
		Generating insights about the audience our online content is reaching, improving our products and services, and improving the user experience	Our legitimate interests in effectively marketing and improving our products and services	Cloud-hosted communications platform Cloud-hosted log storage and analysis tools Other companies in the E6 group	
Information about how you use our client documentation web portal	Logging activities taken on the Website when you are signed in using your assigned credentials	Optimizing our Website content and developing product features	Our legitimate interests in effectively marketing and improving our products and services	Cloud-hosted log storage and analysis tools	Up to 3 months following your interaction with our Website

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		Detecting and investigating potential misuse of our information assets	Our legitimate interests in protecting our intellectual property and in detecting and investigating cyber attacks on our Websites	Other companies in the E6 group	
Information about how you interact with our webinars and online content, including content of messages or feedback you submit, and associated metadata	Logged automatically when you access our webinars and other online content	Optimizing our online content and generating insights about its audience	Our legitimate interest in effectively marketing our products and services	Cloud-hosted customer relationship management platform	Up to 12 months after you inform us that you do not want us to contact you (including by clicking the Unsubscribe link in one of our emails), so that we have a record of your preference; or up to 12 months following your last known interaction with E6 communications, E6 Events, Websites, or personnel **
		Detecting potential misuse of our information assets	Our legitimate interest in protecting our intellectual property	Cloud-hosted communications platform Other companies in the E6 group	
Information about your visits to our Websites derived from analytics and advertising cookies, including information about which pages you visit and how much time you spend on them	Collected through cookies placed on your computer if you consent to them when you visit our Websites (please see our Cookie Policy for more details)	Improving our products and services, documentation, and marketing messaging Associating visits to our Website with unique visitors, and with the LinkedIn profiles of those visitors if they have allowed advertising cookies on their browser, for purposes of targeted advertising	Your consent	Cloud-hosted customer relationship management platform Cloud-hosted web analytics platform Other companies in the E6 group	Up to 12 months after you inform us that you do not want us to contact you (including by clicking the Unsubscribe link in one of our emails), so that we have a record of your preference; or up to 12 months following your last known interaction with E6 communications, E6 Events, Websites, or personnel **
		Where you follow tracking URLs to our website from our marketing emails, combining information derived from opening and click-through of marketing emails with cookie-derived information to generate insights about your interests and those of your company	Our legitimate interest in marketing our products and services to individuals and companies we believe may be interested		

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Inferences we have made about your preferences and interests	Generated by us based on information collected about your interactions with our marketing communications, Websites, online content, and personnel	Optimization of marketing and sales messaging, including through combining these inferences with information we hold about other people	Our legitimate interest in marketing our products and services to individuals and companies we believe may be interested	Cloud-hosted customer relationship management platform Other companies in the E6 group	Up to 12 months after you inform us that you do not want us to contact you (including by clicking the Unsubscribe link in one of our emails), so that we have a record of your preference; or up to 12 months following your last known interaction with E6 communications, E6 Events, Websites, or personnel **
Your name, company name, job title, and contact details; contents and metadata of electronic communications you send to us in your role as a member of staff for one of our corporate customers or vendors; contents of any other correspondence you send to us	Sent by you or your company to us for business-to-business purposes	Furthering business between our two companies, including: negotiation and execution of contracts, and other legal matters; billing and payment; implementation and support of your company's products and services; implementation and support of our company's products and services	Our legitimate interests in concluding contracts, fulfilling our contractual obligations, collecting accounts receivable, enforcing our contractual and statutory rights, and providing our products and services	Cloud-hosted customer relationship management platform Cloud-hosted communications platform Cloud-hosted storage platform Cloud-hosted project management platform Legal counsel (where applicable)	Until the conclusion of the business purpose for which the information was collected. Where there is a contractual relationship between your company and E6, any Personal Information relating to the agreement itself and specific performance thereof may be retained for up to 7 years following the termination of the agreement, or longer where required by applicable law. Other contents and metadata of electronic communications may be deleted after shorter periods of time when no longer deemed necessary for business purposes; information collected via cloud-hosted messaging applications other than email will typically be deleted after 90 days. Information collected for due diligence purposes will typically be retained for up to 12 months if your company is not selected to provide products or services to E6.
		Marketing of our company's products and services to your company**	Our legitimate interest in marketing our products and services effectively	Accounting firm of record (where applicable)	
		Detecting and preventing cyber attacks	Our legitimate interest in deterring, preventing, and investigating cyber attacks	External auditors (where applicable)	
		Looking up publicly available information about you*** that is relevant to our legitimate business purposes such as marketing our products and services to your company, performing due diligence on products and services your company offers, or collecting payments due and enforcing our legal rights	Our legitimate interests in marketing our products and services effectively; in contracting with vendors of good reputation and suitable experience; and in collecting accounts receivable and enforcing our contractual and statutory rights	Other companies in the E6 group	

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Publicly available information about you that is relevant to our legitimate business-to-business purposes***	Collected using Internet search engines, professional networking websites, and public records of government or professional bodies	Optimization of marketing messaging, including through combining publicly available information with other information we have about you and your company Performing due diligence on products and services your company offers, or on prospective business partners Collecting payment due and enforcing our legal rights	Our legitimate interests in marketing our products and services effectively; in contracting with vendors and business partners of good reputation and suitable experience; and in collecting accounts receivable and enforcing our contractual and statutory rights	Cloud-hosted customer relationship management platform Cloud-hosted communications platform Cloud-hosted storage platform Cloud-hosted project management platform Legal counsel (where applicable) Accounting firm of record (where applicable) External auditors (where applicable) Other companies in the E6 group	Until the conclusion of the business purpose for which the information was collected. Where there is a contractual relationship between your company and E6, any Personal Information relating to the agreement itself and specific performance thereof may be retained for up to 7 years following the termination of the agreement, or longer where required by applicable law. Information collected for due diligence purposes will typically be retained for up to 12 months if your company is not selected to provide products or services to E6.
Records we create about you relating to business-to-business transactions	Generated by us in the course of doing business with your company	Furthering business between our two companies, including: negotiation and execution of contracts, and other legal matters; billing and payment; implementation and support of your company's products and services; implementation and support of our company's products and services	Our legitimate interests in concluding contracts, fulfilling our contractual obligations, collecting accounts receivable, enforcing our contractual and statutory rights, and providing our products and services	Cloud-hosted customer relationship management platform Cloud-hosted communications platform Cloud-hosted storage platform Cloud-hosted project management platform Legal counsel (where applicable) Accounting firm of record (where applicable) External auditors (where applicable) Other companies in the E6 group	Until the conclusion of the business purpose for which the information was collected. Where there is a contractual relationship between your company and E6, any Personal Information relating to the agreement itself and specific performance thereof may be retained for up to 7 years following the termination of the agreement, or longer where required by applicable law. Other contents and metadata of electronic communications may be deleted after shorter periods of time when no longer deemed necessary for business purposes; information generated via cloud-hosted messaging applications other than

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					email will typically be deleted after 90 days. Information generated regarding due diligence will typically be retained for up to 12 months if your company is not selected to provide products or services to E6.
Your name, contact information, work history, and educational and professional qualifications; contents and metadata of electronic communications you send to us	Submitted by you as a job application after following a link from the Careers page on our Website, or emailed by you to the email address provided on our Careers page OR Submitted to us by a 3 rd -party recruiter with your consent	Contacting you regarding job openings at E6 Evaluating whether you are a good candidate for our job openings based on the information that you have provided Keeping your résumé on file to be considered for future job openings with us	Your consent	Cloud-hosted human resources management platform Cloud-hosted communications platform Cloud-hosted storage platform Other companies in the E6 group	If you email your résumé to us, initial application review may take up to 30 days and we will then delete your information if we decide not to progress with contacting you; if we progress with contacting you, we treat your information the same as if submitted via the online form
		Searching your job application information for relevant skills and qualifications Looking up publicly available information about you that is relevant to our hiring process***	Our legitimate interest in hiring qualified candidates who are fit and proper persons for the respective roles		If you submitted a job application online by following the link from the Careers page, or if we received your résumé from a recruiter, we will typically retain your job application information for up to two years (no more than 12 months if you are located in the UK or EEA, unless you receive a conditional offer of employment; or up to 4 years if you are located in California)‡ Other contents and metadata of electronic communications may be deleted after shorter periods of time when no longer deemed necessary for business purposes; information collected via cloud-hosted messaging applications other than

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					email will typically be deleted after 90 days.
Answers that you provide to skills assessment questions, and, where applicable, associated metadata	Submitted by you using a cloud-hosted assessment portal, or by email (dependent on assessment type)	Evaluating whether you are a good candidate for our job openings	Our legitimate interest in hiring qualified candidates who are fit and proper persons for the respective roles	Cloud-hosted assessment platform Cloud-hosted human resources management platform Cloud-hosted communications platform Other companies in the E6 group	If you have applied for a job at E6, we will typically retain this information for up to two years (no more than 12 months if you are located in the UK or EEA, unless you receive a conditional offer of employment; or up to 4 years if you are located in California)*.
Publicly available information about you that is relevant to our hiring processes***	Collected using Internet search engines, professional networking websites, and public records of government or professional bodies	Evaluating whether you are a good candidate for our job openings	Our legitimate interest in hiring qualified candidates who are fit and proper persons for the respective roles	Cloud-hosted human resources management platform Cloud-hosted communications platform Cloud-hosted storage platform Other companies in the E6 group	If you have applied for a job at E6, we will typically retain this information for up to two years (no more than 12 months if you are located in the UK or EEA, unless you receive a conditional offer of employment; or up to 4 years if you are located in California)*. If you have not applied for a job and we attempt to contact you as part of our recruiting processes, we will delete any Personal Information collected about you if you decline to be interviewed or do not respond to our inquiry in a reasonable period of time.
Records we create relating to recruiting and hiring	Generated by us when undertaking and documenting hiring processes and decisions	Informing and documenting our hiring decisions	Our legitimate interest in hiring qualified candidates who are fit and proper persons for the respective roles	Cloud-hosted human resources management platform	We will typically retain this information for up to two years (no more than 12 months if you are located in the UK or EEA, unless you

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		Demonstrating compliance with applicable employment law	Compliance with our legal obligations	Cloud-hosted communications platform Cloud-hosted storage platform Other companies in the E6 group	receive a conditional offer of employment; or up to 4 years if you are located in California); with the exception that metadata of electronic communications may be deleted after shorter periods of time when no longer deemed necessary for business purposes, and information generated via cloud-hosted messaging applications other than email will typically be deleted after 90 days
Contents (including your name, contact details, and, where applicable, proof of identity) and metadata of communications you send to us in order to exercise your rights regarding your Personal Information [See “Personal Information of an End Customer” for information about requests and complaints]	Submitted by you as a request to us through on- or offline channels (e.g., email, online form, phone call, or postal mail)	Locating your Personal Information subject to your request Verifying your identity to ensure the security of your Personal Information Reasonably fulfilling your request or explaining why it cannot be fulfilled, or can be fulfilled only in part Demonstrating compliance with applicable data protection laws and defending ourselves against legal claims	Compliance with our legal obligations Our legitimate interest in defending ourselves against legal claims	Cloud-hosted communications platform Cloud-hosted storage platform Cloud-hosted project management platform Legal counsel (where applicable) EU designated representative (where applicable) Supervisory authorities (where applicable) Other companies in the E6 group	Up to 12 months following completion of responding to your request, except where we need to store this information for longer in order to demonstrate compliance with applicable law or to defend against legal claims, in which case these records may be retained for up to 7 years following final adjudication of legal claims, or longer where required by applicable law. Where a shorter period of time is sufficient to demonstrate compliance with applicable law and no legal claims are anticipated, we will delete your information as soon as this purpose is fulfilled.
Records we create relating to data protection activities	Generated by us when we investigate or remediate information security incidents and data breaches, or when we respond to your requests	Investigating and remediating of information security incidents and data breaches, including notification of affected parties	Our legitimate interests in enforcing our contractual and statutory rights and fulfilling our contractual and legal obligations	Cloud-hosted communications platform Cloud-hosted storage platform	Until the conclusion of the business purpose for which the information was collected. Where a data breach is confirmed or a legal cause of action exists

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	regarding your Personal Information	Establishment, exercise, and defense of legal claims		Cloud-hosted project management platform Legal counsel (where applicable)	or is anticipated to exist, the contents of these records may be retained for up to 7 years following conclusion of notifications to affected parties or final adjudication of legal claims, whichever comes later (or longer where required by applicable law). Contents and metadata of electronic communications may be deleted after shorter periods of time when no longer deemed necessary for business purposes; information generated via cloud-hosted messaging applications other than email will typically be deleted after 90 days.
		Demonstrating compliance with applicable data protection and cyber security laws and regulations	Compliance with our legal obligations	External auditors (where applicable) EU designated representative (where applicable) Supervisory authorities (where applicable) Law enforcement and judicial authorities (where applicable) Other companies in the E6 group	

* If you ask us to erase your Personal Information, we will comply without undue delay, regardless of the retention period shown in this table, except insofar as it is necessary to store and process your Personal Information either (1) to fulfill a mandatory legal obligation we are subject to; (2) for the establishment, exercise, or defense of legal claims; or (3) to pursue overriding legitimate business interests that cannot be fulfilled without continuing to process your Personal Information, such as (a) entering into or performing contracts with our customers and vendors, (b) maintaining adequate records of employees and contractors, (c) investigating cyber attacks on our Websites, and (d) protecting our intellectual property.

† For Australian card programs, processing and storage of End Customer Personal Information takes place primarily in Australia using local cloud infrastructure. Encrypted payment operations and strong authentication services are performed in the EU, with backup services in Singapore. When E6 troubleshoots an issue on behalf of our customer, End Customer Personal Information may be viewed remotely by our support team members in the U.S. or our other offices, but this is strictly limited to what is required to resolve the issue.

** If you have been in communication with our sales, finance, legal, or operations staff for other business purposes but no longer wish to receive our marketing communications, we may keep your contact details on file but remove them from our marketing communications lists and stop sending marketing emails to you. For example, if we have a contract with your employer and you have been copied on emails relating to performance of that contract, we may not be able to delete your email everywhere it appears in our systems, but we will still delete your contact details from our marketing communications lists at your request. Additionally, if you indicate that you do not want to receive certain marketing communications from us by clicking the Unsubscribe link in one of our emails, replying "Not interested", or otherwise changing your communication preferences, we may keep your details on file in order to record your preferences with respect to our marketing communications, unless you tell us to delete your information altogether.

‡ Once you have accepted a conditional job offer from us, this Policy will no longer apply, and your job application information will be subject to our internal policies on confidential information.

*** We will not intentionally collect or process sensitive information about you from public sources except where (a) either you have manifestly made that information public yourself or the information has been published in a major media publication; (b) the information is directly relevant to the business purpose for which it is being collected; and (c) our legitimate interests are not overridden by your fundamental privacy rights. We will not intentionally collect or process sensitive information about you for marketing purposes.

