E6 Privacy Policy

# Updated: February 24, 2023

# Privacy Policy Effective Date

This privacy policy (the “Policy”) is effective as of February 24, 2023. We may amend this Policy from time to time, and changes will be posted on this web page with the effective date noted here.

We encourage you to review this Policy periodically. If we make significant changes to this Policy, we will place a prominent notice on this page for a reasonable period of time afterwards, so that it will be easier for you to see that changes have been made.

# Summary

This Policy applies to the Personal Information that Episode Six, Inc., or its subsidiaries and affiliates (collectively, “E6”) collect when:

* You use our public website at episodesix.com or our customer documentation web portal (collectively, the “Websites”)
* You provide your name and/or contact details to E6 by other means for marketing purposes
* We obtain your name and/or contact details from third parties to whom you have given consent to share your contact details
* You communicate with us for business purposes in your role as a member of staff for one of our corporate customers or vendors
* You submit your résumé or curriculum vitae (“CV”) to E6 by email or through a link from our Website
* We obtain publicly available information about you in connection with a job you are a candidate for or in connection with the business relationship between our companies.

“Personal Information” is any information we collect about you that could reasonably be used to identify you, either directly or indirectly, as well as any other information we collect or process about you that can reasonably be connected with your identity.

This Policy explains how we collect, process, and store your Personal Information. This Policy also describes your options and rights with respect to your Personal Information, as well as how to exercise those rights. Before engaging with us, submitting information to us, or buying or using our services, please review this Policy carefully. You may print this Policy or download a PDF version.

Unless otherwise noted in this document, we act as the controller of Personal Information that we collect and process within the scope of this Policy.

Please note that, where our Websites or emails contain links to third-party websites, their privacy policies will govern any Personal Information collected by those third parties when you follow the links to their websites, except insofar as they are collecting your Personal Information on our behalf (for example, when you are applying for a job or submitting a request regarding exercise of your rights).

# Who does this policy apply to?

This Policy applies to:

* Visitors to our Websites
* Individuals who have requested additional information about E6 products and services
* Our mailing list for E6 news and updates (“newsletter”) and other marketing communications
* Individuals who communicate with us for other business purposes, typically in their roles as members of staff for our customers or vendors
* Job candidates who have not yet received a conditional job offer, where other confidentiality agreements or data protection notices are not in effect.

Where other confidentiality agreements or data protection notices govern the use and handling of Personal Information provided to us by our customers, by our staff (including job candidates who have received a conditional offer of employment), and by our vendors, this Policy does not apply and the terms of these other agreements or notices shall prevail. Please note that, if you receive and choose to accept a conditional offer of employment from us, our internal policies on confidential information will govern our handling of your Personal Information from that point forward.

# What personal information do you collect about me?

## Personal information you provide to us

### When you request information from us

When you sign up for our newsletter or submit a request for information about our company or our products and services via our Website, you submit contact details relevant to your request. Likewise, you may provide your contact details to a member of E6 staff in order to receive additional information about our company or our products and services.

These types of Personal Information may include your name, email address, company name, job title, and phone number. If you request a physical copy of E6 marketing materials, we may ask for your business mailing address.

If you communicate with us in order to exercise your rights regarding your Personal Information, we will collect the contents of your request and any subsequent related correspondence, including metadata from electronic communications (e.g., IP addresses, originating phone numbers or servers, time stamps, etc.).

### When you communicate with us for other business purposes

If you communicate with us for other business purposes, including as part of your work at a current or prospective E6 customer or vendor, Personal Information we collect may include your name, business contact details you provide, the name of the company you work for, and your job title. Contact details may include but are not limited to your email address, phone number, fax number, business mailing address, and office location. We also collect the contents of any emails and electronic messages, faxes, voicemails, or postal correspondence you send to us, including metadata from electronic communications (e.g., IP addresses, originating phone numbers or servers, time stamps, etc.).

### When you apply for a job with us

If you send us your résumé or CV, and/or complete a job application by following one of the links on our Careers webpage, we will have the information you submit to us, which may include your name, your contact details (e.g., email address, phone number, mailing address), your work history, and your educational and/or professional credentials. We also collect the contents of any emails and electronic messages, faxes, voicemails, or postal correspondence you send to us, including metadata from electronic communications (e.g., IP addresses, originating phone numbers or servers, time stamps, etc.).

**Please do not** send us unsolicited documents containing sensitive information, namely: any photographs of yourself or anyone else; any government-issued identification numbers; your date or place of birth; or any information about your marital or family status, immigration status, arrests or criminal convictions, national origin, racial or ethnic background, religious or philosophical beliefs, trade union membership, health or sex life, or sexual orientation. If you include these types of sensitive information in any résumé or CV you send to us, we may permanently delete the document for security reasons.

## Personal information collected automatically

### When you visit our Websites

When you visit our Websites, we may automatically collect Personal Information such as:

* Your IP address and associated location information
* Other information about your device which is automatically sent by your web browser (your device fingerprint)
* Information derived from analytics cookies about how you use our Website
* Information derived from analytics or third-party cookies linking your visit to our Website with our contact profile for you or with your LinkedIn profile

We use third-party cookies and tracking pixels on our Websites. You can read more about our use of analytics and advertising cookies, including how to block them, in [our Cookie Policy](https://episodesix.com/cookie-policy/).

If you use our customer documentation web portal by logging in using your assigned credentials, in addition to collecting the above information we may also log your activities on the portal, including pages visited and actions taken on those pages.

### When you receive our marketing communications

When you receive our newsletter or other marketing communications from us by email, we may collect information about whether you have viewed the email by use of a tracking pixel in the email. More information about what a tracking pixel is and how we use them is available in [our Cookie Policy](https://episodesix.com/cookie-policy/).

In our marketing emails, each hyperlink to our Website has a unique web address (uniform resource locator, or URL) which is different from every other URL in other marketing emails we out. When you click a link in one of our marketing emails, we collect information associating the visit to that specific web page with your email address and our associated contact profile for you.

## Personal information provided to us by third parties

### Contact details

We may collect information from third parties who have received your consent to share your contact details. For example, if you attended a conference where we had an exhibit and you gave consent for the conference organizer to share your business contact information with exhibitors at the conference, the conference organizer may share your contact details with us.

We do not knowingly purchase lists of contact information from third parties where the third party has not documented receiving consent from the individuals on the list to have their information shared.

### Publicly available information about business contacts

We may use Personal Information we have collected from our business communications with you, for example in your role at one of our corporate customers or vendors, to look up additional publicly available information about you that is relevant to our legitimate business purposes, such as effectively marketing our products and services to your company or performing due diligence on products and services your company offers. We may look up such information using Internet search engines like Google, professional networking sites like LinkedIn, and public records of government or professional bodies.

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 and (b) the information is essential for our legitimate business interests that are not overridden by your fundamental privacy rights. We will not collect or process sensitive information about you for marketing purposes.

### Information about job candidates

When we are hiring for a job opening, sometimes we work with third-party recruiters to find suitable candidates. If you have provided your résumé or CV to a third-party recruiter and given your permission to share it with prospective employers, we may receive that information (e.g., your name, your contact details, your work history, and your educational and/or professional credentials) from the recruiter. If we are subject to additional contractual privacy restrictions on the use of Personal Information we receive about you from the recruiter, we will honor those in addition to the provisions in this Policy. We may also search for these types of employment-related information on LinkedIn and other public websites in order to approach suitable candidates as part of our in-house recruiting processes.

If you apply for a job with us, we may collect additional publicly available information about you that is relevant to our hiring processes (for example, industry awards, publications you have authored, regulatory enforcement actions against you, public commendations by colleagues, etc.) using Internet search engines like Google, professional networking sites like LinkedIn, and public records of government or professional bodies. 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 and (b) the information is directly relevant to whether you are a fit and proper person to undertake a specific role.

## Personal information generated by us

As disclosed in this section, we may communicate with and/or about you, and draw inferences from Personal Information we hold about you. These processes may generate new Personal Information about you which is also subject to this policy.

### Marketing activities

We may combine publicly available information about you and your company with other Personal Information we hold in order to draw inferences, such as information regarding your and your colleagues’ preferences and interests. Where these inferences can be linked with your individual identity, they are Personal Information.

### Business-to-business activities

When we communicate with you in your role at one of our current or prospective customers or vendors, or we communicate about you and/or your company internally, we may produce decisions or other records that are linked to your individual identity. Insofar as this information relates to you personally rather than to the company you are working for, it may be Personal Information.

### Data protection activities

We may combine Personal Information that has been automatically collected about you and others in order to investigate suspicious activity, data breaches, or other information security incidents, and to identify affected parties and provide any required notifications. These processes may produce records containing new Personal Information (for example, the fact that we sent you a data breach notification). We may also generate records containing new Personal Information by communicating with you regarding your requests about your Personal Information and by communicating internally or with third parties in order to fulfill these requests.

### Recruiting and hiring activities

In order to ensure compliance with applicable laws, we maintain documentation regarding hiring processes and decisions. This may include internal notes and communications, and communications to recruiters, that contain Personal Information we have produced (for example, notes on answers to interview questions).

## No personal information collected from or about children

We never knowingly collect Personal Information from or about anyone under 18 years of age. If we become aware that we have inadvertently collected the Personal Information of someone younger than 18, we will permanently delete that Personal Information as soon as possible.

# What do you do with my personal information?

## Personal information you provide to us

### Marketing and responding to requests for information

If you have signed up for our newsletter or requested us to contact you with more information about our company or our products and services, we will use the Personal Information you have provided in order to fulfill your request.

If you have previously provided your email address to us when requesting additional information about our company or our products and services, we may email our newsletter to you in pursuit of our legitimate interest in marketing our products and services to individuals we have reason to believe are interested. If you do not want to receive our newsletter or other marketing communications, please click the Unsubscribe link in the newsletter email or contact us at Compliance@episodesix.com.

If you have contacted us in order to exercise your rights regarding your Personal Information, we will use the information you provide to locate your Personal Information that your request concerns; to verify your identity in order to keep your Personal Information secure; to reasonably fulfill your request or explain why it cannot be fulfilled, or can be fulfilled only in part; and to demonstrate our compliance with applicable data protection laws and defend ourselves against any legal claims that may arise pertaining to your request.

### Business-to-business purposes

If you work for a current or prospective customer or vendor, we will use your contact information to communicate with you for legitimate business purposes, such as negotiation and execution of contracts, and other legal matters; billing and payment; implementation and support of your company’s products and services; and marketing, implementation and support of our company’s products and services. Likewise, we will use the contents and metadata of communications that you send for legitimate business purposes, including investigation of any suspected cyber incidents or suspicious activity. We will retain these types of Personal Information in accordance with our corporate data retention policy. We may also use Personal Information you have provided to look up publicly available information about you, and the company you work for, that is relevant to our legitimate business purposes such as effectively marketing our products and services to your company or performing due diligence on products and services your company offers. We will not intentionally collect or process sensitive information about you for marketing purposes.

### Recruiting and hiring

If you have applied for a job with us or emailed us your résumé or CV, we will use the Personal Information you have provided to evaluate whether you may be a good candidate for any roles we have available, and to contact you if we would like to interview you. This processing may include automated searching of your Personal Information for relevant skills and qualifications, but no hiring decisions will be based solely upon automated processing.

If we contact you for an interview, we may also use your Personal Information to look up additional publicly available information about you that is relevant to our hiring processes, with appropriate limitations. We will not use your Personal Information to conduct criminal or financial background checks without your written consent. As noted above, we may delete your résumé or CV immediately if it contains sensitive information that we prefer not to store.

We will not use your Personal Information to conduct criminal or financial background checks without your written consent. We also will not use Personal Information collected in connection with recruiting and hiring for marketing purposes.

## Personal information collected automatically

We use IP addresses and device information from our Website visitors to detect, prevent, and investigate cyber attacks. We may also use this information, along with information from analytics cookies and tracking URLs in our marketing emails, to generate insights about the audience our Websites are reaching, to market our products and services more effectively, and to improve the experience of our Website users.

Analytics and third-party cookies may also be used to link your visit to our public Website with our contact profile for you or with your LinkedIn profile. This information allows us to understand who is visiting our Website and to provide you with marketing information that is more relevant to you. We can also associate information about click-through of links in our marketing emails with your contact profile and with the company your email address belongs to.

You can read more about our use of analytics and third-party cookies, including how to block them, in [our Cookie Policy](https://episodesix.com/cookie-policy/).

Information we log about your use of our customer documentation web portal when you are logged in using your assigned credentials, including through the use of analytics cookies, may be used to generate insights about which content is most useful to our customers, to optimize content presentation, to develop product features, and to detect and investigate any potential misuse of our information assets.

Information obtained from tracking pixels about whether you have opened our newsletter or other marketing emails may be combined with information about which links you have clicked on from the emails in order to optimize our marketing communications, and may be combined with similar information about other people with email addresses at your company in order to build a better picture of what information is relevant to your business for our marketing purposes. We may also use information about email opening rates to update our lists of marketing contact information to remove email addresses of individuals who repeatedly do not open our emails, in order to avoid sending unwanted communications.

## Personal information provided to us by third parties

### Marketing purposes

We may use contact details provided to us by third parties with your consent to contact you with information about our company and our products and services, and to send you our newsletter. For example, if you attended a conference where we had an exhibit, and you provided your consent to the conference organizer to be contacted by exhibitors, we may receive your contact details from the conference organizer and subsequently contact you.

If you do not want to be contacted by us, please click the Unsubscribe link in any emails you receive from us, or contact us at Compliance@episodesix.com. Please note that even if you opt out of receiving promotional emails from us, we may continue to send you emails about business transactions or in response to your requests.

### Business-to-business purposes

We may use publicly available information about you and your company, and may combine this information with other information we have about you and your company, to draw inferences, such as information regarding your preferences and interests, and to improve our sales and marketing strategies by ensuring that our communications are relevant to you, or as part of undertaking due diligence on your company’s products and services, and for other legitimate business purposes such as collecting payments that are due or enforcing our legal rights.

### Recruiting and hiring

When we collect employment-related information on LinkedIn and other public websites as part of our in-house recruiting processes, we use public information to draw inferences about the suitability of skilled professionals for job openings we have available, and to contact individuals whom we would like to interview. If we collect publicly available information about you for our in-house recruiting, we will provide you with notification, including a link to this Policy, in a timely manner where required by applicable law. If we then contact you regarding an interview and you decline or do not respond within a reasonable time, we will delete any Personal Information we collected about you in this manner.

If your résumé or CV is provided to us by a third-party recruiter with your consent, we will use the Personal Information you have provided to evaluate whether you may be a good candidate for any roles we have available, and to contact you if we would like to interview you. This processing may include automated searching of your Personal Information for relevant skills and qualifications, but no hiring decisions will be based solely upon automated processing.

If you have applied for a job with us and we look up publicly available information about you, we may make a note of any public information found that is directly relevant to our hiring process, including the source of that information; with the exception that, if the information is sensitive in nature, including any information about arrests or criminal convictions, we will not record or further process that information unless either you clearly made the information public yourself or the information was published in a major media outlet. We will not record any public information about you that is not directly relevant to whether you are a fit and proper person to undertake a specific role. Any Personal Information obtained from public sources in this manner may be included in our evaluation of your job application.

We will not use your Personal Information to conduct criminal or financial background checks without your written consent. We also will not use Personal Information collected in connection with recruiting and hiring for marketing purposes.

## Personal information generated by us

### Marketing purposes

We may use inferences we have drawn regarding your preferences and interests to provide you with marketing information that is more relevant to you. We may also combine these inferences with information about other people to better understand the audience for our marketing communications and to improve our products and services.

### Business-to-business purposes

Any records we create about you relating to business-to-business transactions will be used to further purposes such as documentation of contracts and other legal matters; billing and payment; implementation and support of your company’s products and services; and implementation and support of our company’s products and services.

### Data protection purposes

Any records we create in the course of investigating information security incidents or in the course of remediating data breaches, will be used for these purposes; for the establishment, exercise, and defense of legal claims; and for demonstration of compliance with applicable law. Likewise, any records we create in the course of responding to your requests about your Personal Information, or in the course of communicating internally or with third parties in order to fulfill your request, will be used for these purposes.

### Recruiting and hiring

Any records we create in the course of our recruiting and hiring processes will be used to inform and document our hiring decisions, and to demonstrate compliance with applicable law.

# Who do you share my personal information with and why?

We may share your Personal Information with our vendors and service providers in order to fulfill your requests and to provide you with a product or service, to operate our Websites, to market and improve our products and services, to manage our email and business contact information, to store our corporate records, to conclude or perform contracts, to complete audits, and to manage our hiring processes. We may also share Personal Information with law firms representing us where necessary to establish or defend legal claims. Our vendors and service providers are contractually obligated to safeguard your Personal Information and to use it only as directed by us or as required by applicable law; they are not permitted to use your Personal Information for their own marketing or recruiting purposes.

We may also share Personal Information where required by legal authorities of competent jurisdiction; when we believe such sharing is necessary to protect the vital interests of an individual or to protect overriding interests of E6 or other entities in the safety and security of their property and personnel; and in the case of a corporate transaction, such as a merger, acquisition, or divestiture.

When using your Personal Information in the ways described in this Policy, we may share your Personal Information with service providers based outside of the European Economic Area (“EEA”), including in the United States. If you are located in the EEA, Switzerland, or the United Kingdom (“UK”), we will ensure that your Personal Information is protected at a level at least equivalent to that mandated by the laws where you are, either through the existence of a decision by the European Commission that the country where the service provider is based offers an adequate level of data protection, or through appropriate contractual safeguards between E6 and the service provider. Please contact us if you would like additional information about the safeguards we use when transferring your Personal Information.

## Customer relationship management (CRM) and web analytics

When we use your Personal Information to send you our newsletter or otherwise communicate with you about our company, products, and services, we share your information with third-party vendors whose products and services enable us to manage our marketing contacts and email. If you unsubscribe or contact us to opt out from receiving these marketing communications, those preferences will also be shared with these vendors to ensure that we are able to honor your preferences going forward and don’t communicate with you by mistake.

If you communicate with us for business-to-business purposes in your role working for one of our corporate customers or vendors, we may also share your contact information with these cloud-hosted third-party CRM tools so that we can manage our contact list and track our sales and marketing activities.

Other Personal Information we collect about you for marketing purposes, such as data from analytics cookies, third-party cookies, tracking URLs, and tracking pixels may also be shared with these third-party CRM tools and/or web analytics platforms.

The providers of these third-party CRM tools and web analytics may use aggregated, de-identified data derived from Personal Information we share with them in order to generate audience insights and improve their products and services. They are not allowed to use your Personal Information for other purposes except as directed by us or as required by applicable law.

## Messages and corporate records

When you send us email for business-to-business purposes, your email and its associated metadata will be stored on a third-party cloud-hosted email service. Likewise, if you leave us a voicemail, it will be stored, with any associated metadata, on a third-party cloud-hosted voice-over IP (VoIP) phone system. If you send us electronic messages over a messaging application such as Microsoft Teams for business purposes, those messages and their associated metadata will be shared with the third-party cloud-hosted messaging service. If you send us a fax, it may be shared with a third-party e-fax service which converts the fax to email. Files and documents that you send to us for business purposes, as well as due diligence materials, may be saved to third-party cloud-hosted storage platforms and project management platforms. Personal Information that we receive from third parties or create by communicating with and/or about you may also be saved to relevant cloud-hosted storage or communications platforms.

The providers of these third-party platforms are only allowed to process your Personal Information as directed by us or as required by applicable law, and may not reuse your Personal Information for their own purposes.

## Human resources management

When you have applied for a job with us, your Personal Information may be uploaded to a third-party cloud-hosted human resources management platform for secure storage and management of job applications and résumés. Emails, including attachments, that you or recruiters representing you send will be stored on a third-party cloud-hosted email service. Likewise, your résumé or CV and related information may be sent by email within E6 during the hiring process and thus shared with a third-party cloud-hosted email service. Your résumé or CV may also be saved to a third-party cloud-hosted document storage platform, subject to suitable access restrictions, during the hiring process for access by interviewers at E6.

We will not share your Personal Information with third parties for purposes of background checks or credit checks without your written consent. We also will not share or sell Personal Information, where collected in connection with recruiting and hiring, to third parties for their own marketing or product development purposes.

## Cyber security

When we use Personal Information collected via our Websites to detect and prevent cyber attacks, we may upload the data to third-party analysis tools in order to find any patterns requiring investigation. Reports from these third-party analysis tools are made available only to us and our auditors. If we detect suspicious activity on our Website based on the Personal Information we have automatically collected and we believe that a crime may have occurred, we may share that evidence with law enforcement.

## Sharing within the E6 group of companies

Episode Six, Inc., is the parent company of several wholly owned subsidiaries. All members of this E6 group of companies agree to abide by the commitments of this Policy. Where your Personal Information has been collected by one member of the E6 group of companies, your Personal Information may be transferred to another member of the E6 group of companies where that transfer is necessary in order to fulfill the purpose for which the Personal Information was collected. All E6 member companies follow the same high baseline of data protection and information security standards and are obligated to provide your Personal Information with a level of data protection that is at least equivalent to that required by local law in the jurisdiction where you are located.

# How do you keep my personal information safe?

We take all due care to protect your Personal Information from accidental or unlawful destruction, unapproved alteration, loss, and unauthorized disclosure or access. We use state-of-the-art technical and organizational measures to safeguard your information. Among other technical measures, we use encryption, password complexity and session timeout requirements, multifactor authentication, network monitoring, and audit logging; among other organizational measures, we employ the principle of least access (i.e., our staff can only access the fewest systems and least amount of Personal Information required to do their jobs), remove terminated and inactive accounts, undertake log reviews, perform vendor due diligence, and maintain up-to-date business continuity and cyber incident plans. All of our staff are contractually committed to confidentiality and security requirements, and are required to undertake security training when they begin their roles and at least annually thereafter.

Because no security measures are perfect, we also have policies and procedures to provide timely notification to affected parties and relevant supervisory authorities in the event of a data breach.

# How long do you keep my personal information for?

We only keep Personal Information for as long as it is needed. When Personal Information is no longer needed for the purpose it was collected for, we will permanently delete or anonymize the Personal Information unless we are required to retain the Personal Information based on your requests or in relation to legal claims and obligations. If we collected Personal Information based on your consent, we will also delete your Personal Information when you withdraw your consent, except to the extent that we need a record (if any) of your consent withdrawal.

Please see the Overview Table at the end of this Policy for more details on how long we retain different types of Personal Information we collect.

If you ask us to erase your Personal Information, we will do so without undue delay, 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 our employees and contractors, (c) investigating cyber attacks on our Websites, and (d) protecting our intellectual property. If we cannot completely erase your Personal Information for one of these reasons, we will delete your Personal Information to the greatest extent possible and ensure that it is not used for any other purposes.

# Why are you allowed to collect my personal information?

We use the following legal bases for collecting Personal Information:

* We may collect or process Personal Information with your consent, such as when you subscribe to our newsletter, submit a request for information, or apply for a job with us.
* We may collect or process Personal Information that is necessary to provide our products and services and fulfill your requests.
* We may collect or process Personal Information where required by applicable law.
* We may collect and process Personal Information when we have a legitimate interest in doing so, such as marketing our services, fulfilling our contractual obligations, providing our products and services, hiring suitable job candidates, preventing cyber attacks, or protecting the safety and security of our property and personnel, as long as our legitimate interests are not outweighed by your fundamental privacy rights. We may also process Personal Information where necessary for the legitimate interests of third parties in protecting the safety and security of their property or personnel.
* We may collect or process Personal Information if necessary to protect the vital interests of the user or another individual.

Please see the Overview Table at the end of this Policy for additional details about our legal bases for collecting and processing different types of Personal Information.

# What are my rights regarding my personal information?

If you are located in the EEA or the UK, you may have the following legal rights regarding your Personal Information:

* **Right to object.** You have the right to object to processing of your Personal Information on the basis of our legitimate interests or for direct marketing. If you object to our processing your Personal Information for direct marketing purposes, including building a profile for direct marketing purposes, we are obligated to stop.
* **Right to withdraw consent.** If you have given us consent to collect or process your Personal Information, including by submitting your information directly to us, you may withdraw that consent at any time. You have the right to withdraw your consent without any negative effects on you except insofar as we are unable to process your Personal Information for the purpose you consented to.
* **Right of access.** You have the right to find out what Personal Information we have about you, and to receive a copy of your Personal Information without undue delay if you request it. Normally, such copies will be provided free of charge. However, if your requests are clearly unfounded or become excessive in nature, we may charge a reasonable fee taking into account the administrative costs of fulfilling your request or we may refuse to act on the request. Please note that, particularly where Personal Information we hold about you is interlinked with the Personal Information or intellectual property of others, we are only allowed to disclose your Personal Information in such a way that it does not infringe upon the rights and freedoms of others. This means that copies of information relating to you may contain redactions in order to protect the rights of others.
* **Right** **to rectification.** You have the right to correct or update Personal Information we hold about you if you believe it is incorrect or out of date.
* **Right to erasure / right to be forgotten.** You have the right to ask us to permanently delete or destroy your Personal Information.
* **Right to restriction of processing.** You have the right to ask us to restrict the processing of your Personal Information if you object to our processing on the basis of our legitimate interests, or if we no longer need your Personal Information for the original purposes of processing but you require it for establishment, defense, or exercise of legal claims. You can also request restriction of processing if time is needed to verify the accuracy of the Personal Information, or if you believe that our processing was unlawful but do not want us to erase the data.
* **Right to data portability.** You have the right to request a digital copy of your Personal Information in a commonly used, machine-readable format that may be transferred to another organization.
* **Rights regarding automated processing.** You have the right not to be subject to decisions based solely on automated processing that have significant effects on your life, except where the automated decision-making is necessary for performance of or entering into a contract, where the automated decision-making is authorized by your local laws that provide suitable safeguards, or where the automated decision-making is based on your explicit consent.
* **Right to complain to a supervisory authority.** You have the right to complain to a supervisory authority for data protection matters in the country where you are located, details of which can be provided upon request.

We will never discriminate or retaliate against you in any way for exercising your privacy rights.

While these rights are guaranteed by law to individuals located in the EEA, the UK, and in certain other jurisdictions to an equivalent or partial extent, we aim to provide at least this level of privacy protection to everyone covered by this Policy.

## Exercising your rights

If you would like to exercise your rights regarding your Personal Information that we may have collected, please contact us according to the area in which you live, as set out in the subsections below.

### European Economic Area

E6 has appointed VeraSafe Ireland Ltd. as our designated representative in the European Union for data protection matters (“EU Designated Representative”), pursuant to Article 27 of the General Data Protection Regulation of the European Union. If you are [located in the EEA](https://verasafe.com/public-resources/eea-members/) and would like to exercise your rights regarding your Personal Information that we may have collected, please contact our EU Designated Representative using the following contact details:

Secure online enquiry form: <https://verasafe.com/public-resources/contact-data-protection-representative>

Telephone: +420 228 881 031

Postal mail: VeraSafe Ireland Ltd.
 Unit 3D North Point House
 North Point Business Park
 New Mallow Road
 Cork T23AT2P
 IRELAND

### United Kingdom

If you are located in the UK, please contact our designated representative in the UK, Episode Six Ltd., using the following contact details:

Email: Compliance@episodesix.com

Telephone: +44 117 205 1277

Postal mail: Episode Six Ltd.
 7 Bell Yard
 London
 WC2A 2JR
 UNITED KINGDOM

### Singapore

If you are located in Singapore, please contact our data protection officer for Singapore using the following contact details:

Email: Compliance@episodesix.com

Telephone: +65 3158 9790

Postal mail: Episode Six Pte. Ltd.
 10 Collyer Quay
 Ocean Financial Centre
 Level 40, Office 4057
 SINGAPORE 049315

### Rest of World

If you are located elsewhere in the world, please submit your request using the following details:

Email: Compliance@episodesix.com

Telephone: +1 757 530 5294

Postal mail: Episode Six, Inc.
 201 West 5th St., Ste. 1100
 Austin, TX 78701
 UNITED STATES OF AMERICA

## Verifying your identity

Please note that we may request additional information from you in order to verify your identity before acting on your request. Please do not send copies of any identifying documents or government identification numbers via unencrypted email.

# Overview Table

| **Categories of Personal Information** | **Method of Collection** | **Uses** | **Legal Basis** | **Categories of Third-Party Recipients** | **Retention\*** |
| --- | --- | --- | --- | --- | --- |
| Your name, company name, job title, and contact details | 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 platformCloud-hosted communications platformCloud-hosted storage platformOther 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 until we decide based on your non-response that you are not interested in receiving marketing communications from us \*\* |
| 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 |
| 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 |
| Your email address | Submitted by you to sign up for our newsletter | Sending our newsletter and any associated privacy notices to you | Your consent | Cloud-hosted customer relationship management platformCloud-hosted communications platformOther 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 until we decide based on your non-response that you are not interested in receiving marketing communications from us \*\* |
| Your name, company name, job title, and contact details | Purchased from or shared by a third party that has received your consent to share your contact details | 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 platformCloud-hosted communications platformCloud-hosted storage platformOther 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 until we decide based on your non-response that you are not interested in receiving marketing communications from us \*\* |
| Whether you have viewed marketing emails we have sent to you | Collected by a tracking pixel in marketing emails that we send out, including our newsletter | Optimization of marketing messagingEnabling us to infer when recipients may not be interested in receiving further marketing communications from usCombining information about which emails you open, which email 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 platformOther companies in the E6 group | Up to 12 months following your last known interaction with E6 communications, Websites, or personnel |
| Whether you have clicked on links in marketing emails we have sent to you | Collected by unique tracking URLs in marketing emails that we send out, including our newsletter | Optimization of marketing messagingCombining information about which emails you open, which email 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 platformOther companies in the E6 group | Up to 12 months following your last known interaction with E6 communications, Websites, or personnel |
| Your IP address and associated location information, and your device fingerprint | Logged automatically when you visit our Websites | Detecting and preventing cyber attacks | Our legitimate interest in deterring, preventing, and investigating cyber attacks | Cloud-hosted log storage and analysis toolsOther companies in the E6 group | Up to 3 months following your interaction with our Website |
| Generating insights about the audience our Websites are reaching, improving our products and services, and improving the experience of our Website users | Our legitimate interests in effectively marketing and improving our products and services |
| Information about how you use our customer 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 toolsOther companies in the E6 group | Up to 3 months following your interaction with our Website |
| 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 |
| 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](https://episodesix.com/cookie-policy/) for more details) | Improving our products and services, documentation, and marketing messagingAssociating 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 platformCloud-hosted web analytics platformOther companies in the E6 group | Up to 12 months following your last known interaction with E6 communications, 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 |
| Inferences we have made about your preferences and interests | Generated by us based on information collected about your interactions with our emails, Websites, 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 platformOther companies in the E6 group | Up to 12 months following your last known interaction with E6 communications, 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 platformCloud-hosted communications platformCloud-hosted storage platformCloud-hosted project management platformLegal 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 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 |
| Detecting and preventing cyber attacks | Our legitimate interest in deterring, preventing, and investigating cyber attacks |
| 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 |
| 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 companyPerforming due diligence on products and services your company offers, or on prospective business partnersCollecting 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 platformCloud-hosted communications platformCloud-hosted storage platformCloud-hosted project management platformLegal 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 platformCloud-hosted communications platformCloud-hosted storage platformCloud-hosted project management platformLegal 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 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 pageORSubmitted to us by a 3rd-party recruiter with your consent | Contacting you regarding job openings at E6Evaluating 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 platformCloud-hosted communications platformCloud-hosted storage platformOther 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 formIf 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 email will typically be deleted after 90 days. |
| Searching your job application information for relevant skills and qualificationsLooking 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 |
| 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 platformCloud-hosted communications platformCloud-hosted storage platformOther 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 platformCloud-hosted communications platformCloud-hosted storage platformOther companies in the E6 group | 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)†; 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  |
| Demonstrating compliance with applicable employment law | Compliance with our legal obligations |
| 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 | 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 requestVerifying your identity to ensure the security of your Personal InformationReasonably fulfilling your request or explaining why it cannot be fulfilled, or can be fulfilled only in partDemonstrating compliance with applicable data protection laws and defending ourselves against legal claims | Compliance with our legal obligationsOur legitimate interest in defending ourselves against legal claims | Cloud-hosted communications platformCloud-hosted storage platformCloud-hosted project management platformLegal 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 regarding your Personal Information | Investigating and remediating of information security incidents and data breaches, including notification of affected partiesEstablishment, exercise, and defense of legal claims | Our legitimate interests in enforcing our contractual and statutory rights and fulfilling our contractual and legal obligations | Cloud-hosted communications platformCloud-hosted storage platformCloud-hosted project management platformLegal counsel (where applicable)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 | 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 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 |

\* 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.

\*\* 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 marketing communications from us by clicking the Unsubscribe link in one of our emails, we may keep your details on file in order to record your preference for not receiving further 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.