

PRIVACY POLICY

Last updated May 2023

Thank you for choosing PingPong and its Group Companies (each as defined in our Terms and Conditions and hereinafter collectively “**Company**”, “**we**”, “**us**”, and “**our**”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us [through](#) the ways specified in Article 12.

When you visit our website to contact us or to use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our website and our Services.

This privacy policy applies to all information collected through our website, and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “**Services**”).

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us. A PDF version of this privacy policy can be found [here](#).

For residents of the European Economic Area, United Kingdom and Switzerland, personal information is processed by or on behalf of the controller:

PingPong Europe SA
Rue du Laboratoire 9
Luxembourg L-1911
Luxembourg

1. WHAT INFORMATION DO WE COLLECT?

We may collect one or more of the following categories of personal information about you when you visit our website, use or register for our Services, request additional information about our Services, or otherwise interact with us.

Category of Personal Information Collected	Types of Personal Information Collected	Sources of Personal Information Collected	Business Purpose for Collection of Personal Information
Identifiers	Name (First, Last, Maiden, if applicable), Address, Prior Addresses, Phone Number, Email Address, Business Contact Information, Business Associates, Corporate Affiliations,	Directly from you, cookies and other tracking technologies, Public Sources.	Provide our Services, Identification, Communications, Security, Legal, Compliance and Regulatory Obligations, Marketing Purposes.

	Account Username/Password, Payment Information, Credit Card Number, Banking Information (including account information and statements), IP Address.		
Protected Characteristics under California or Federal Laws	Age, Gender, National Origin	Directly from you.	Provide our Services, Identification, Legal, Compliance and Regulatory Obligations.
Sensitive Personal Information	Driver's License Number, Passport Number, Precise Geolocation	Directly from you, Cookies and other tracking technologies.	Provide our Services, Identification, Legal, Compliance and Regulatory Obligations.
Commercial Information	Purchase History, Invoices	Directly from you.	Provide our Services, Identification, Legal, Compliance and Regulatory Obligations.
Biometric Information	Photos, Fingerprints, Photo or Video "Selfies"	Directly from you.	Provide our Services, Identification, Legal, Compliance and Regulatory Obligations.
Internet / Network Activity	Device ID, and Device Settings (e.g., language preference, time zone), Login Information, Login History, Browser Type and Version, Browser Plug-In Types and Versions, Operating System and Platform, Google Analytics Cookies, and Information about your visit on our website.	Cookies and other tracking technologies.	Provide our Services, Identification, Legal, Compliance and Regulatory Obligations.

Professional & Employment Information	Business, Job Title, Business Associates, Corporate Affiliations, Information from your Curriculum Vitae (CV).	Directly from you.	Provide our Services, Identification, Legal, Compliance and Regulatory Obligations.
Audio, Electronic, Visual, Thermal, Olfactory or Similar Information	Call Center Recordings.	Directly from you.	Provide our Services, Identification, Legal, Compliance and Regulatory Obligations.

We do not collect the following categories of personal information about our customers: education information, defined as information that is not publicly available personally identifiable information as defined in the United States Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99); or inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We process this personal information on the following legal bases:

- **Consent:** We may process your personal information if you have given us specific consent to use it for a specific purpose.
- **Legitimate Interests:** We may process your personal information when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

Automated Decision-Making / Profiling: Please note, PingPong does not utilize automated individual decision-making (making a decision solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain things about an individual).

2. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

***In Short:** We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

3. HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our website or Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to contact you, enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. If you choose not to provide information, we may be unable to provide services to you or the quality of services you receive may be affected. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To contact you regarding our products and Services.**
- **To facilitate account creation and logon process.**
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time.
- **To enforce our terms, conditions and policies for Business Purposes, Legal Reasons and Contractual Obligations.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To deliver services to the user.** We may use your information to provide you with the requested Services.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

4. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:** We may sell or share, as those terms are defined under applicable data protection laws, your personal information with your consent, to comply with laws, to provide you with services, respond to your inquiries, to protect your rights, or to fulfill business obligations.*

With your consent, we may share your personal information with third parties. Otherwise, we may sell or share your personal information with the following categories of recipients and in the following situations:

- **Vendors, Consultants, Other Third-Party Service Providers and Affiliate Companies.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. We work with third parties that provide to us engine or application development and/or processing services; information systems hosting, infrastructure, maintenance, backup, storage, security, support and other information technology-related services; advertising, marketing and related analytics services; promotion, distribution, resale and support services related to our products and services; consulting and other technical and/or business services, including to our professional advisors, attorneys, and auditors, which may require access to information about you to perform such services on our behalf. We share your information with these service providers only for our business purposes pursuant to written contracts. Our contracts with these third-party service providers require protection of your information consistent with this privacy policy, and require that they retain, use and disclose your information only as necessary to provide the services in accordance with such contracts.
- **Legal and Regulatory Authorities.** We may share information about you with a third party if we believe that sharing such information is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, or to exercise or defend any legal claims, (c) protect the security or integrity of our products and services, and (d) protect us, our customers, employees or other persons from harm or illegal activities.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Third Party Advertisers.** We may sell your personal information with third parties for the purposes of engaging in targeted advertisements.

5. DO WE ENGAGE IN CROSS-BORDER DATA TRANSFERS?

***In Short:** We may transfer your personal information to a third party that is located in a jurisdiction other than the one from which we collected your personal information, including to countries that have not been deemed to have an adequate level of protection for the rights and freedoms of data subjects.*

If we do transfer your personal information to another jurisdiction, we will do so following due diligence and provided that the data recipient is subject to contractual agreements imposing obligations on it to ensure appropriate technical and organizational measures are implemented and maintained at all times to prevent the unauthorized and unlawful processing of personal information, and the accidental loss or destruction of, or damage to, personal information,

consistent with our obligations under applicable data protection laws. If you are a resident of the European Economic Area, the United Kingdom or Switzerland, you may request additional details regarding cross-border data transfers and our contractual agreements by contacting us at dpo@pingpongx-eu.com.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your personal information only for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements. If we collect any biometric information about you, we will not store that information for longer than three (3) years and we will destroy all copies of such biometric information within three (3) years from the date of collection.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate administrative, technical, and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us through the ways specified in Article 12.

9. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:** In some regions, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

Depending upon where you are located, certain choices and rights may be available to you under applicable data protection laws, including the right to request access to your personal information or to have your personal information deleted.

If you have questions or comments about your privacy rights, you may email us through the ways specified in Article 12.

“Do-Not-Track”: Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized.

As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

“Shine the Light” and “Eraser” Laws: Residents of the State of California may request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties’ direct marketing purposes.

California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA): The CCPA, as amended by the CPRA, provides California residents and/or their authorized agents with specific rights regarding the collection and storage of their personal information.

Your Right to Know: California residents have the right to request that we disclose the following information to you about our collection and use of your personal information over the past twelve (12) months. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Upon verification, we will disclose to you:

1. The categories of personal information we have collected about you.
2. The categories of sources for the personal information we have collected about you.
3. The specific pieces of personal information we have collected about you.
4. Our business or commercial purpose for collecting or selling your personal information.
5. The categories of third parties to whom we have sold or shared your personal information, if any, and the categories of personal information that we have shared with each third-party recipient.

Your Right to Opt-Out of Sale or Sharing of Personal Information: California residents have the right to opt-out of the sale of their personal information by submitting a request as directed on the homepage of our website.

Please note that we do not knowingly sell the personal information of any individuals under the age of 16.

Where we are sharing your personal information with third parties for the purposes of cross-context behavioral advertising or profiling, you may opt-out of such sharing at any time by submitting a request as directed on the homepage of our website or by contacting us using the information in the “Contact Us” section below.

Your Right to Limit Use of Sensitive Personal Information: California residents have the right to request that we limit our use of any sensitive personal information to those uses which are necessary to perform the Services or for other specifically-enumerated business purposes under the CCPA, as amended by the CPRA.

Your Right to Delete: California residents have the right to request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Once your request is verified and we have determined that we are required to delete the requested personal information in accordance with the CCPA, we will delete, and direct our third-party service providers to delete, your personal information from their records. Your request to delete personal information that we have collected may be denied if we conclude it is necessary for us to retain such personal information under one or more of the exceptions listed in the CCPA.

Your Right to Correct: Under the CCPA, as amended by the CPRA, California residents have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes for which we are processing such personal information. We will use commercially reasonable efforts to correct such inaccurate personal information about you.

Non-Discrimination: You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA, as amended by the CPRA.

Verifying Your Request: Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. In the case of access and deletion, your request must be verifiable before we can fulfill such request. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information or a person authorized to act on your behalf. We will only use the personal information that you have provided in a verifiable request in order to verify your request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority. Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive or manifestly unfounded.

For Individuals Located in the European Economic Area (EEA), United Kingdom (UK) or Switzerland:

You have a number of rights under applicable data protection laws in relation to your personal information. Under certain circumstances, you have the right to:

- Have access to your personal information by submitting a request to us;
- Have your personal information deleted;
- Have your personal information corrected if it is wrong;
- Have the processing of your personal information restricted;
- Object to further processing of your personal information, including to object to marketing from us;
- Make a data portability request;
- Withdraw any consent you have provided to us;
- Restrict any automatic processing of your personal information; and
- Complain to the appropriate Supervisory Authority.

To exercise any of these rights, please contact us as outlined in the “Contact Us” section below.

Opting out of email marketing: You can unsubscribe from our marketing email list or request not to be contacted by us in the future at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list, and/or will not be contacted – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may:

- Note your preferences when you register an account with the site.
- Access your account settings and update preferences.
- Contact us using the contact information provided.

10. DO WE HAVE CONTROL OVER ANY THIRD-PARTY LINKS?

In Short: No. We do not have the ability to control any information provided under third-party links.

We may provide links to other websites or resources provided by third parties. These links are provided for your convenience only. We have no control over the content of those websites or resources and accept no responsibility for them or for any loss or damage that may arise from your use of them. If you decide to access of the third-party links on the Sites, you do so entirely at your own risk and subject to the terms and conditions of those websites.

11. DO WE MAKE UPDATES TO THIS POLICY?

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this privacy policy or if you would like to exercise any of your privacy rights and you are a resident in:

- The European Economic Area, United Kingdom, or Switzerland, the "data controller" of your personal information is PingPong Europe SA. You can contact us directly regarding the processing of your information, by email at dpo@pingpongx-eu.com, or by post to the address set forth below. If you believe we have not adequately resolved any issues, you may contact the Supervisory Authority concerned.

PingPong Europe SA
Data Protection Department
Rue du Laboratoire 9
L-1911
Luxembourg

- The United States of America, the “data controller” of your personal information is PingPong Global Solutions Inc. You can contact us directly regarding the processing of your information, by email at privacy@pingpongx.us
- Any country other than those listed in the immediately preceding bullet, the “data controller” of your personal information is the PingPong Group member company with which you contract pursuant to our Terms and Conditions. You can contact us directly regarding the processing of your information by email at service@pingpongx.com or by post at the address set across from the relevant PingPong Group entity in your Terms and Conditions.