

# Privacy Policy

March 15, 2026

Welcome! Convergent is a business-to-business (B2B) company with the top priority of being our Customers' Best Service Provider. This Privacy Policy ("Policy") describes how Convergent, its subsidiaries, and its affiliates (collectively, "Convergent") will collect, use, retain, and disclose Personal Information (defined below) and applies in locations where this notice is posted or referenced, including on websites and apps (each a "Site"), as well as for interactions that we have with customers, vendors, or other associates.

Convergent is a global group of entities, and as such this policy includes certain jurisdiction-specific content:

- **If you are a California resident**, please see the [California Privacy section](#) below for our notice at collection and additional information, including how to request that we not 'sell' or 'share' your personal information and your rights under California law.
- **If you are a Canada resident**, please see the [Canadian Privacy section](#) for additional information on your rights under Canadian law.
- **If you are located in the UK, European Economic Area, or Switzerland**, please see the [European Privacy section](#) for additional information on our lawful basis for processing your Personal Information as well as your privacy rights under European laws.
- **If you are a resident of the Middle East**, please see the [Middle East Privacy](#) section for additional information on our lawful basis for processing your Personal Information as well as your privacy rights under applicable laws.
- **If you are a resident of Asia**, please see the [Asia Privacy section](#) for additional information on our lawful basis for processing your Personal Information as well as your privacy rights under applicable laws.
- **If you are a resident of Oceania**, please see the [Oceania Privacy section](#) for additional information on your rights under applicable law.
- **If you are a resident of Latin America (Argentina, Chile, Columbia, Mexico, and Brazil)**, please see the [LATAM Privacy section](#) for additional information on our lawful basis for processing your Personal Information and your privacy rights under applicable applicable law.

Residents of other regions may contact [dataprotectionofficer@convergent.com](mailto:dataprotectionofficer@convergent.com) with any questions about how we process personal information.

## This policy does not apply to:

- Employees, independent contractors, or job applicants of Convergent, for whom we maintain a separate privacy notice (please see [convergent.com/colleague-application-privacy-notice/](https://convergent.com/colleague-application-privacy-notice/))
- End users of products or systems that we sell to or deploy, configure, support, or manage for our customers — such end users should refer to privacy notices provided by the respective customers.

**When a customer engages Convergent as a service provider or data processor:** Convergent's processing is governed by applicable customer agreements. Moreover, Convergent is an authorized distributor or reseller, and not the manufacturer, developer, or provider, of products and certain services that you may obtain from Convergent ("Third Party Products"). As such, Convergent's obligations are limited solely to processing performed by Convergent's personnel. The manufacturer, developer, or provider ("OEM") of such Third Party Products may be independent processors of Personal Information you control, and their processing is governed by any applicable end user licensing agreements, terms, or data processing addendum(s) between you and them. Convergent is not responsible for the privacy or data security practices of OEMs or Third Party Products, which may be different from those described in this Policy. Convergent is also not responsible for its customers' compliance with applicable privacy or data protection laws.

## INFORMATION WE COLLECT

**Personal Information.** For purposes of this Policy, unless otherwise required by applicable law, "**Personal Information**" means any information that identifies you, relates to or describes you, is reasonably capable of being associated with you, or could reasonably be linked to you. Categories of Personal Information we may collect about you include:

- **Identifiers.** This may include identification and contact information, such as your name, job title, company name, company address, phone number, and email address
- **Profile Information.** This may include profile information about your company (e.g., type, size, category, or geographic location of your company)
- **Commercial Information.** This may include information about the products or services we purchase from you (in the case of vendors) or sell to you (in the case of customers), information about our business relationship, and service information (including service history),
- **Financial Information.** This may include billing, payment, purchase, sale, and transaction information and history about products or services that we purchase from you (in the case of vendors) or sell to you (in the case of customers), including payment account and other financial information
- **Shipping, Delivery, and Location Information.** This may include delivery addresses, shipping, and logistics information. This also includes information that permits us to determine your location, such as your physical address or other location information you share with us.
- **Audio Information.** This may include audio recordings or transcriptions of calls between you and our employee and service representatives, where permitted by law and, if required, with your consent
- **Demographic information.** This may include demographic information about your business, where permitted by and in accordance with requirements of laws in the applicable jurisdiction
- **Communications.** This may include communications history, including correspondence between us and feedback you may provide
- **Internet or other electronic network activity information.** This may include Internet and Browsing data, such as your IP address or information regarding your interactions with our websites, mobile applications, emails, or advertisements.
- **Preferences and Inferences.** We may collect your preferences or make inferences about you, reflecting what we believe to be your preferences or characteristics, based on other personal information we have

- Other information that you submit to or share with us from time to time

The Personal Information above that is required to manage and maintain our business relationship with you, provide you products and services or purchase your products and services, manage financials, and comply with associated legal requirements are mandatory for engaging in business with Convergent. Other Personal Information is optional and you may elect whether or not to provide, or whether or not to interact with us in a manner that provides, such information to us — understanding that declining to provide information may impact our ability to provide services.

## **COOKIES AND OTHER TRACKING TECHNOLOGIES**

If you are browsing or navigating through our Site, we collect general data analytics which includes browsing data. These analytics may include information about your computer, the pages you visit on our Site, and your browsing behavior. We use this information for research, analysis and reporting so that we can improve our navigation, page structure and page content. Where required by law, we will obtain your consent to collect these analytics.

As commonly done on websites, we, or an authorized third party, may place a cookie or similar tracking technology on your device that collects information, including Personal Information, about your online activities over time and across different sites. Where required by law, we will obtain your consent to set cookies on your device.

- Visitors to sites on the convergent.com domain can see a listing of the different cookies and tracking technologies on our Site, review our cookie policy, and manage cookie preferences, at <https://www.convergent.com/cookie-policy/>. Our cookie policy also includes links to the privacy policies of the third parties responsible for the cookies.
- Visitors to other Convergent sites can review preferences that may be available on that site, opt out of certain uses of cookies for advertising purposes by visiting [www.aboutads.info/choices](http://www.aboutads.info/choices), and can consult the user instructions for your Internet browser for additional controls relating to the use of cookies, including blocking certain cookies by adjusting browser settings.

Choices you make regarding cookies may be website, device, and browser specific, and may be deleted whenever you clear your cookies or your browser's cache. This means you may need to adjust your cookie preferences on each website, device, and browser you use. If you disable cookies, certain site functions may not work properly or as intended.

Cookies and other tracking technologies allow your browser to send information for a variety of purposes including offering you optimal navigation, producing statistics on your visits, offering you personalized content and targeted advertising. We may use "Session Cookies" during your current visit for several reasons, including to help with site functionality during a particular visit, and "Persistent Cookies" for several purposes, including to allow us to track repeated visits to the Site and enable certain site functionality. For example, "Persistent Cookies" may be used to store Site Preferences to have them set for a user when that user visits the Site at a later date. In some cases, we may link cookies with other information, including information you voluntarily provide on the Site. Further information about cookies and related technologies and how they work is available at [allaboutcookies.org](http://allaboutcookies.org).

We may use cookies or other tracking technologies to:

- record information that your web browser makes available, such as your browser type, browser language, software and hardware attributes, the date and time of your visit, the website from which you came and the pages on this Site that you visit. We use this information to help us monitor our Site traffic, understand visitor behavior, and improve site features and functionality;
- collect information from you in connection with emails that we send, such as email open rates and click-through rates, allowing us to manage the email marketing experience and activity; and
- help us maintain the security of our sites, maintain and operate our sites, fix bugs, and assist with site functions.

We may use third party services and technologies to collect the cookie and browsing information described here, including for analytics, site management, and advertising. We may also permit third parties to use tracking technologies to collect information on our Site for ours and their commercial purposes, including to help manage and display advertisements, and to tailor advertisements to ours or their products or services that may interest you on our Site or other sites.

## SOURCES FROM WHICH WE OBTAIN PERSONAL INFORMATION

We collect Personal Information from the following categories of sources:

- **Directly from you:** We process information that you or someone acting on your behalf directly provides to us. For example, you may provide us with Identification and contact information, company profile information, billing information, demographic information, and commercial information when you obtain products or services from us, contact customer service, or contact us via email, over the phone, in person, or through third parties.
- **From your devices and our networks:** We use cookies and related technologies to collect Personal Information from and across your devices when you interact with the Site or our emails, subject to any preference settings.
- **From other businesses or individuals:** We work with business, advertising, and marketing partners and social media platforms that give us Personal Information about you that they have collected. We also may receive your personal information from someone acting on your behalf, such as your employer. We may obtain Personal Information about you from publicly available resources and mailing lists. We may also obtain Personal Information such as identification and contact information from agencies whom you have permitted to share your information with third parties such as us.
- **From social media:** If you connect with us on a social media site, we may receive contact and Identification information, Internet and browsing data, and any other Personal Information contained in your social media posts or profile.
- **From publicly available sources:** We may collect information about you from publicly available sources, including internet sites or government databases.

## HOW WE USE AND DISCLOSE YOUR INFORMATION

We may, to the extent permitted by applicable law, use and disclose your information to:

- Carry out actions consistent with the purposes for which you provided the Personal Information
- Conduct the business relationship between us and you or your organization
- Engage in pre-contractual business evaluations and vetting
- Carry out our obligations arising from any contracts entered into by you and us (or by your employer and us) as well as conduct other actions consistent with our business relationship with you or your employer
- Seek your views or comments on the services we provide through surveys or otherwise
- Notify you of changes to our products or services as well as third party products or services that we sold to you
- Send you communications that you have requested or that may be of interest to you, including activities or promotions of our products or services, or those of our affiliates or others
- Provide you with marketing communications and offers about our products and services
- Provide you information about the products and services of our business partners or potential business partners
- Remarket to you on third-party websites
- Send you newsletters, event notices, announcements, and other communications
- Communicate with you about our relationship including updates to this Privacy Policy and other legal or business changes
- For purposes of training or to improve our services
- Comply with our legal, contractual or regulatory obligations
- Conduct other activities as we may disclose to you from time to time

You can unsubscribe from our marketing emails by clicking on the unsubscribe link located on the bottom of marketing emails or by contacting us with your unsubscribe request. Please note that opting out of marketing communications does not opt you out of receiving business communications related to your current relationship with us, such as communications about your products, service announcements or security information.

We may disclose your Personal Information, in accordance with applicable laws:

- **To Our Family of Companies** - As a global organization offering a wide range of products and services, with business processes, management structures, and technical systems that cross borders, we have implemented global policies, along with standards and procedures, for consistent protection of Personal Information. We may share Personal Information with our family of companies, including our affiliates and subsidiaries worldwide and to countries in the world where we do business.
- **To Our Service Providers, Contractors, Subcontractors, and Agents** – We may disclose your Personal Information in furtherance of the purposes listed in this policy with third parties that provide us services or help us facilitate certain functionalities, including communications, marketing, maintenance, subcontracting of services, and analytics.
- **To Our Business and Vendor Partners** - we may share your Personal Information with selected associates to help us further our business relationship with you or your employer. For example, if you are with a Convergent vendor partner, we may provide your Personal Information to a prospective Convergent customer that may be interested in your company's products or services; and if you are with a Convergent customer, we may provide your Personal Information to a Convergent vendor partner with product or service offerings that may be of interest to you.

- **To Third Party Marketing Partners** – We may disclose Personal Information to third-party social media networks, advertising networks and websites, so that we can market and advertise, including on third party platforms and websites.
- **During Business Transfers** – If we decide to sell, buy, merge or otherwise reorganize businesses and/or if our company becomes acquired in whole or in part, such a transaction may involve the disclosure of Personal Information to prospective or actual purchasers and their authorized agents or service providers engaged to facilitate such a transaction.
- **To Investors or Potential Investors** – We may disclose Personal Information to our investors to enable them to exercise oversight of our operations, or to potential investors as part of purchase-related diligence
- **For Safety and Legal Reasons** – We may disclose Personal Information to government agencies pursuant to judicial proceedings, court order, or legal process. We may also share your Personal Information to protect our rights, property or safety of our colleagues, or that of our business partners, suppliers or clients, and communities. We may disclose information when we believe in good faith that the law requires it, or in response to any demand by law enforcement authorities in connection with a criminal investigation or civil or administrative authorities in connection with a pending civil case or administrative investigation
- To other entities and for other purposes as we may disclose to you from time to time.

We may also share anonymous or de-identified data on an aggregate basis in the normal course of operating our business; for example, we may share information publicly to show trends about the general use of our services.

## INTERNATIONAL TRANSFERS

Our international footprint may involve the transfer of Personal Information between different subsidiaries, as well as to third parties located in the countries where we do business. Some countries have implemented transfer restrictions for Personal Information. Where required, we implement Standard Contractual Clauses approved by the EU Commission, or similar contractual clauses in other jurisdictions (including the UK and Switzerland), or the appropriate mechanism required by the applicable laws and regulations in your jurisdiction, along with other appropriate supplemental measures to protect the data being transferred. This includes transfers to suppliers or other third parties. You may request further information regarding our transfer mechanisms by sending an email to [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com).

## ACCURACY

We use reasonable efforts to ensure that your Personal Information is kept accurate, complete, and up to date. We may not routinely update your Personal Information, unless such an update is necessary. In order to help us maintain and ensure that your Personal Information is accurate and up to date, you must inform us, without delay, of any change in the information you provide to us.

## RETENTION PERIOD

We retain Personal Information as necessary to fulfill the purposes for which it is processed, including the security of our processing, complying with legal and regulatory obligations (e.g. audit, accounting and statutory retention terms), handling disputes, and for the establishment,

exercise or defense of legal claims in the countries where we do business. Where appropriate, Convergent may de-identify or anonymize such Personal Information.

## **HOW TO CONTACT US**

If you have a question related to this Privacy Policy, please contact us by sending an email to [dataprotectionofficer@convergent.com](mailto:dataprotectionofficer@convergent.com) (for Brazil, please use [privacidade-br@convergent.com](mailto:privacidade-br@convergent.com)). Your message should include your company name with specific details of your inquiry and it will be forwarded to the appropriate member of our legal or Data Protection Team for the proper response.

The controller of your Personal Information is the Convergent entity with whom you conduct business. Locations and addresses can be found at <https://www.convergent.com/about/locations/>, or by contacting [dataprotectionofficer@convergent.com](mailto:dataprotectionofficer@convergent.com).

Convergent may act as a Data Processor for Personal Information regarding end users of products or systems that we sell to or deploy, configure, support, or manage for our customers — such end users should refer to privacy notices provided by the respective customers.

## **RIGHT TO LODGE A COMPLAINT**

In the event you consider our processing of your Personal Information not to be compliant with the applicable data protection laws, you can lodge a complaint directly with us by sending an email to [dataprotectionofficer@convergent.com](mailto:dataprotectionofficer@convergent.com) (or as otherwise specified in the regional sections, below) and providing specific details of the complaint, including the name of your company if applicable.

For other jurisdictions, please refer to the appropriate governmental webpage for your jurisdiction's supervisory or regulatory authority.

## **CHILDREN**

We do not knowingly collect any Personal Information from children under the age of 18 (or under the applicable age of majority in each jurisdiction in which we operate). If you become aware that your child or an individual under 18 (or the applicable age of majority) has provided their Personal Information through our Site, please contact us using the information provided in the 'How to Contact Us' section above. If we learn that we have received Personal Information on a child under the age of 18 (or applicable age of majority), we will delete that information from our records and systems.

## **STORAGE AND SECURITY**

Convergent stores Personal Information in its information systems, the information systems of its service providers, or in some cases physical files. We deploy procedural and technical measures that are designed to help protect your Personal Information from loss, unauthorized access, disclosure, alteration or destruction, including identity and access management technologies, information security policies, information security training, and information security program reviews. However, we cannot guarantee that third parties will be unable to overcome any such

measures and gain access to your information for unauthorized purposes. By using the Site, you accept the risk that compromise of and unauthorized access to your information is possible.

## CALIFORNIA PRIVACY RIGHTS

The California Consumer Privacy Act (“CCPA”) generally applies to businesses doing business in California and to California residents and information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with California consumers. Convergent operates in a business-to-business (“B2B”) context and generally as a service provider to its customers. Except as otherwise provided by applicable California law, for purposes of requests under this section of the Privacy Policy, Personal Information does not include information we have collected as a service provider to our customers.

If you live in California, you may make the following requests with respect to your Personal Information in accordance with applicable law:

- **Right to Know** – You can request that we disclose to you the categories of Personal Information collected about you, the categories of sources from which the Personal Information is collected, the categories of Personal Information sold, shared, or disclosed, the business or commercial purpose for collecting, selling, or sharing the Personal Information, the categories of third parties with to whom we disclose, sell, or share the Personal Information, and the specific pieces of Personal Information collected about you over the past 12 months.
- **Right to Correct Inaccurate Personal Information** – You can request to correct Personal Information we maintain about you that is inaccurate.
- **Right to Delete** – You can request that we delete your Personal Information that we maintain about you, subject to certain exceptions.
- **Right to Opt-Out of Sale or Sharing for Targeted or Behavioral Advertising Purposes** – Some disclosures of Personal Information may constitute a “sale” or “sharing” under California law, including the use of cookies and other technologies for advertising purposes.
  - You can request to opt-out of the sale of your Personal Information and from the sharing of your Personal Information to an outside party for the purposes of cross-context behavioral advertising by clicking the “Do Not Sell or Share My Personal Information” link on our homepage or by sending us a written request by letter or email to the addresses set out in the “How to Contact Us” section above. If you would like to opt-out of cookie-based tracking for advertising purposes, you can update your cookie preferences as indicated in the “Cookies and Other Tracking Technologies” section above. You can also broadcast an opt-out preference signal recognized by Convergent, such as a Global Privacy Control signal on the browsers or browser extensions that support such a signal. Your opt-out of cookie-based tracking for advertising purposes is specific to the device, website, and browser you are using, and is deleted whenever you clear your cookies or your browser’s cache. This means you need to adjust your cookie preferences on each website, device, and browser you use.

For purposes of this Policy, “sell” means the sale, rental, release, disclosure, dissemination, availability, transfer, or other oral, written, or electronic communication of your Personal Information to an outside party for monetary or other valuable consideration,

subject to certain exceptions in applicable law; and “share” means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, Personal Information to a third party for cross-context behavioral advertising, subject to certain exceptions in applicable law.

California residents can make these requests online by emailing us at [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com), by calling us toll free at 1-877-641-8181, or by submitting your data privacy request via webform at <https://www.convergint.com/about/contact-us/https://www.convergint.com/about/contact-us/> (specify “Privacy Request – Attn: Legal” in the body of the request).

Please note, we will not discriminate against you because you exercised any of the above rights.

Where appropriate or required by law, we will take reasonable steps to verify your identity prior to responding to your requests. The verification steps may vary depending on the sensitivity of the Personal Information.

We may deny certain requests, or fulfil a request only in part, based on our legal rights and obligations. For example, we may retain Personal Information as permitted by law, such as, but not limited to, for tax or other record-keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests.

You may also designate an authorized agent to make a request on your behalf. When submitting the request, please ensure the authorized agent is identified as an authorized agent and ensure the agent has the necessary information to complete the verification process. We may require written proof of the agent’s permission to make a request on your behalf, and we may need to verify your identity directly with you.

For purposes of California residents exercising these rights, please note the following regarding how we collect, and use and disclose your Personal Information as described in this Policy, including in the previous 12 months:

- We may collect, disclose and use for our business and commercial purposes, the following categories of Personal Information as set forth in applicable California law: identification and contact information, company profile information, billing and payment information, transaction and service information, communications, Internet and browsing data, and location information.
  - We collect and use the above categories of Personal Information for the business and commercial purposes described in the section of this Policy titled “How We Use and Disclose Your Information”, including with service providers, business partners, advertising networks, internet service providers, data analytics providers, government entities, and social networks.
  - We collect these categories of Personal Information from the sources described in the section of this Policy titled “Sources from which we obtain Personal Information”, as well as from business partners, third party data providers, advertising networks, internet service providers, data analytics providers, government entities, operating systems and platforms, and social networks.
  - We may disclose each of these categories of Personal Information for our business and commercial purposes to the extent permitted by applicable law with the categories

of parties described in the section of this Policy titled “How We Use and Disclose Your Information.”

- We may “sell”, or “share” for the purposes of cross-context behavioral advertising, the following categories of Personal Information: Internet and browsing data such as your IP Address, mobile advertising identifiers, browser and system versions, browsing history, location data, Identification and Contact information.
- Categories of third parties to whom Personal Information may be “sold”, or “shared” for the purposes of cross-context behavioral advertising: Business partners, advertising and marketing partners, data analytics providers, and social media networks.

Convergint does not knowingly “sell” or “share” the Personal Information of individuals under the age of 16. For additional information please see our practices as set forth in the “Children” section.

**Sensitive Personal Information:** We do not use or disclose Sensitive Personal Information unless it is necessary to:

- provide the goods or perform the services you have requested (such as processing or fulfilling orders and transactions);
- with your consent;
- to prevent, detect, and investigate security incidents;
- prevent malicious, deceptive, fraudulent, or illegal actions against Convergint and/or to prosecute such actions;
- to enable us to perform our services (such as processing payments, verifying your information, servicing accounts, or providing customer service);
- to verify and maintain the quality and safety of our products and services, including upgrades and improvements;
- ensure physical safety; and
- as otherwise authorized by applicable law (such as and show non-personalized advertising as part of your current interaction with us).

We do not use or disclose Sensitive Personal Information for the purpose of inferring characteristics about you without your consent. Under California law, the definition of “Sensitive Personal Information” includes government identifiers, financial account information when paired with access credentials, precise geolocation, biometric data, health information, information about sexual orientation, racial or ethnic origin, religious or philosophical beliefs, or union membership, and contents of mail, email, and text messages except where Convergint is the intended recipient of the message

## **CANADIAN PRIVACY RIGHTS**

Depending upon the Canadian province in which you reside, you may have the following rights with respect to our use of your Personal Information:

- **Access and Mobility** - You may have the right to request whether we hold Personal Information on you and to request a copy of such information. To do so, please contact us at [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com). There are exceptions to this right, so that access may be denied if, for example, making the information available to you would reveal Personal Information about another person, or if we are legally prevented from disclosing such information. You may also have the right to request that computerized

Personal Information collected from you be communicated to you in a commonly used technological format as well as to any person or body authorized by law to collect such information. This right does not extend to information that was created or inferred from your Personal Information and we are under no obligation to communicate such information if doing so raises serious practical difficulties.

- **Accuracy** - We aim to keep your Personal Information accurate, current, and complete. We encourage you to contact us at [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com) to let us know if any Personal Information is not accurate or changes, so that we can update your Personal Information.
- **Withdraw Consent** - If you have provided your consent to the processing of your Personal Information, you may have the right to fully or partly withdraw your consent. To withdraw your consent please follow the opt-out links on any marketing message sent to you or contact us at [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there is another legal ground for the processing. Withdrawal of consent to receive marketing communications will not affect the processing of Personal Information for the provision of our services.
- **Cessation of Dissemination and De-indexation** - You may have the right to request that we cease disseminating your Personal Information and/or de-index any hyperlink attached to your name if such actions are contrary to the law or a court order, or where the following conditions are met:
  - the dissemination of the information causes you serious injury in relation to your right to have your reputation or privacy respected;
  - the injury is clearly greater than the public's interest in knowing the information or the interest of any person's right to express themselves freely; and
  - the cessation of dissemination requested does not exceed what is necessary for preventing the perpetuation of the injury.
- **Re-indexation** - You may have the right to request that we re-index a link providing access to information where the following conditions are met:
  - a failure to do so causes you serious injury in relation to your right to have your reputation or privacy respected;
  - the injury caused by a failure to re-index is greater than the public's interest in knowing the information or the interest of any person's right to express themselves freely; and
  - the re-indexation requested does not exceed what is necessary for preventing the perpetuation of the injury.
- **Complaints** - If you believe that your Personal Information protection rights may have been violated, you have the right to lodge a complaint with the applicable supervisory authority, or to seek a remedy through the courts.

You may enquire about your rights to your Personal Information or how to exercise them by contacting us at [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com). We will generally respond to all access requests within 30 days of the receipt of all necessary information. In circumstances where we are not able to provide access, or if additional time is required to fulfill a request, we will advise you in writing. We may not release certain types of information based upon exemptions specified in applicable laws. Where possible, we will sever the information that will not be disclosed and provide you with access to the remaining information. Should we be unable to provide access to or disclose Personal Information to you, we will provide you with an explanation, subject to restrictions. In certain circumstances, such as where the request is excessive or unfounded, we

may charge you an administration fee for access to your Personal Information. We may also charge for additional copies. We will advise you of any fees before proceeding with a request.

## EUROPEAN PRIVACY

If you are located in the European Economic Area, UK or Switzerland, you have certain rights under relevant European data protection legislation as set forth below.

**Lawful Basis:** Under certain privacy laws, including the General Data Protection Regulation, we must have a lawful basis for the processing of your Personal Information where we are acting as a data controller in respect of it. The lawful bases we rely on are as follows:

- (a) with your consent (for example if you provide consent via our cookie consent mechanism, which can be withdrawn at any time using the preference settings on our website);
- (b) in line with the our legitimate business interests, specifically as is necessary to manage our business and marketing including communicating and responding to queries and managing business relationships;
- (c) to comply with a legal or regulatory obligation; and/or
- (d) pursuant to a contract in place between us and you.

**Privacy Rights:** Please note that these are not absolute rights, there are limits to them, some may not be available to you in respect of all Personal Data.

- **Information** - You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
- **Access** - You have the right to obtain access to your information (if we are processing it), and certain other information (similar to that provided in this Policy). This is so you're aware and can check that we're using your information in accordance with data protection law
- **Deletion** - This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your Personal Data where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
- **Correction** - You are entitled to have your information corrected if it is inaccurate or incomplete.
- **Consent** – If you have given your consent to any processing activity, then you have a right to withdraw such consent. Please note we may have an alternative lawful basis to continue the processing, which we will communicate to you.
- **Restriction** - You have the right to restrict some processing of your Personal Data, which means that you can ask us to limit what we do with it.
- **Objection** - You have the right to object to certain types of processing, including processing based on our legitimate interests in some cases.
- **Portability** - You have rights to obtain and reuse your Personal Data for your own purposes across different services.
- **Complaints** - You may submit a complaint to your local supervisory authority.

To make such a request or lodge an objection, please send an email to [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com). Please specify your company name (so that we know which company you are contacting us about) and provide details of your request. We will contact you if we need more information to process your request.

You may also be eligible to lodge a complaint with the competent data protection authority. The names and contact details of the Data Protection Authorities in the European Union can be found at [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm). The Data Protection Authority for the United Kingdom is the Information Commissioner's Office, and their contact details can be found at <https://ico.org.uk/global/contact-us/>. The Swiss Authority is the FDPIC and their contact details can be found at <https://www.edoeb.admin.ch/edoeb/en/home.html>.

## MIDDLE EAST PRIVACY

If you are outside of the Kingdom of Saudi Arabia, please contact [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com) to inquire about the privacy rights that may be available to you. If you are a resident of KSA, we are required to provide you with details of the lawful bases for processing we rely on of your Personal Information and let you know about certain privacy rights.

**Lawful Basis:** The lawful bases we rely on when we collect your Personal Information directly from you are as follows:

- a. to comply with a legal or regulatory obligation;
- b. pursuant to a contract in place between us and you;
- c. where our processing serves your actual interests, but communicating with you is impossible or difficult; and
- d. for our legitimate interests, specifically as is necessary to manage our business and marketing including communicating and responding to queries and managing business relationships.

The lawful bases we rely on when we **do not** collect your Personal Information directly from you are as follows:

- a. where your Personal Information is publicly available or collected from a publicly available source;
- b. where not collecting or processing of your Personal Information may harm or affect your vital interests;
- e. where your Personal Information is recorded or stored in a form that makes it impossible to identify you, directly or indirectly; and
- f. for our legitimate interests, specifically as is necessary to manage our business and marketing including communicating and responding to queries and managing business relationships.

We only rely on your consent if and to the extent to which one of the lawful bases set out above are not available for a particular processing activity.

**Privacy Rights:** If you are a resident of KSA, you have certain rights under KSA data protection legislation. These rights are set out below. Please note, however, that these are not absolute rights. There are limits to them and some may not be available to you in respect of all Personal Information.

- **Information** - You have the right to be provided with information about how we use your information and your rights. This is why we are providing you with the information in this Policy.
- **Access** - You have the right to obtain access and obtain a copy of your Personal Information (if we are processing it), and certain other information (similar to that provided in this Policy).
- **Destruction (Erasure)** – This right enables you to request the deletion or removal of your Personal Information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
- **Correction** - You are entitled to have your Personal information corrected if it is inaccurate or incomplete.
- **Consent** – If you have given your consent to any processing activity then you have a right to withdraw such consent.
- **Objection** - You have the right to object to certain types of processing, including processing for direct marketing purposes.

To make such a request or lodge such an objection, please send an email to [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com). Please specify your company name (so that we know which company you are contacting us about) and provide details of your request.

We will generally respond to all requests to exercise data subject rights within 30 days of the receipt of all necessary information. In circumstances where we are not able to fulfil your request, or if additional time is required to fulfill a request, we will advise you in writing. Should we be unable to fully meet your request (if, for example, your Personal Information is connected with that of another individual, making it impossible to separate without disclosing that individual's Personal Information), we will provide you with an explanation, to the extent permitted under applicable law.

Where appropriate or required by law, we will take reasonable steps to verify your identity prior to responding to your requests. The verification steps may vary depending on the sensitivity of the Personal Information.

## **ASIA PRIVACY**

If you are outside of China and India, please contact [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com) to inquire about the privacy rights that may be available to you. For residents of China and India, this section explains the lawful basis by which we process your Personal Information as well as your privacy rights under applicable law, including the PRC Personal Information Protection Law (PIPL), the Indian Digital Personal Data Protection Act, 2023 (DPDP Act), and rules and regulations issued thereunder. In the event of any inconsistency between the terms of this Annex and the remainder of the Notice, the terms of this Annex shall prevail.

### **Lawful Basis:**

China	India
<p>We collect and use your Personal Information only when it is necessary to do so. Depending on the circumstance, we may rely on one or more of these legal bases:</p> <ul style="list-style-type: none"> <li>• <b>Your consent</b> – where we obtain your consent. By reading and acknowledging this Policy, you hereby provide your consent to our processing of your Personal Information in accordance with this Policy.</li> <li>• <b>Performance of contract</b> – where it is necessary for the conclusion or performance of a contract to which you are a party.</li> <li>• <b>Statutory obligations</b> – where it is necessary for the performance of statutory duties or statutory obligations.</li> <li>• <b>Emergency</b> – where it is necessary for the protection of the property safety of a natural person in an emergency.</li> <li>• <b>Personal data disclosed by you</b> – where it is necessary to process the Personal Information disclosed by you or legally disclosed within a reasonable scope.</li> <li>• Others provided by the PIPL and applicable Chinese laws and regulations.</li> </ul>	<p>We process your Personal Information only in accordance with the applicable laws and regulations and for a lawful purpose:</p> <ul style="list-style-type: none"> <li>• for which you have given your consent; or</li> <li>• for certain legitimate uses, including for the specified purpose for which you have voluntarily provided your Personal Information to us, and in respect of which you have not indicated to us that you do not consent to the use of your Personal Information; or</li> <li>• to comply with a legal or regulatory obligation.</li> </ul>

**Cross-Border Data Transfer:** In order to carry out global management of operations, projects, and business administration, Convergint’s group of affiliated entities utilize unified or interconnected IT systems to process your Personal Data. Therefore, it is necessary for Company to transfer your Personal Data outside China or India to Convergint’s group of affiliated entities that are located elsewhere. We will implement appropriate mechanisms for cross-border data transfer and conduct relevant procedures where required by the applicable laws and regulations. We will obtain your consent, if required by applicable laws and regulations.

**Privacy Rights:** If you are a resident of China or India, you may have certain rights under applicable privacy laws, as set forth below:

China	India
	<ul style="list-style-type: none"> <li>• <b>Right to access information about Personal Information</b> - To the extent</li> </ul>

<ul style="list-style-type: none"> <li>• <b>Right to know</b> - You have the right to know and make decisions on the processing of your Personal Information.</li> <li>• <b>Right to refuse</b> - You have the right to restrict or refuse others to process your Personal Information.</li> <li>• <b>Right to access</b> - You have the right to consult or copy your Personal Information.</li> <li>• <b>Right to transfer</b> - You have the right to request us to transfer your Personal Information to other parties designated by you, to the extent permitted by the applicable laws and regulations.</li> <li>• <b>Right to correct</b> - You have the right to request us to make corrections or supplements, in case you find that your Personal Information is inaccurate or incomplete.</li> <li>• <b>Right to delete</b> - You have the right to delete your Personal Information provided to us, but where the retention period prescribed by the applicable laws and regulations has not expired, or it is technically difficult to delete the Personal Information, we will cease the processing of the Personal Information, except for the storage and any necessary measure taken for security protection.</li> <li>• <b>Right for explanation</b> - You have the right to request us to explain our rules for processing Personal Information.</li> </ul>	<p>permitted by the applicable laws and regulations, you have the right to request us providing a summary of Personal Information processed by us, the identities of other data fiduciaries and data processors with whom we shared your Personal Information and a description of your Personal Information shared, and any other information related to your Personal Information, provided you have given your consent for us to processing such Personal Information;</p> <ul style="list-style-type: none"> <li>• <b>Right to correction and erasure of Personal Information</b> - You have the right to correction, completion, updating and erasure of your Personal Information of which you have previously given consent.</li> <li>• <b>Right to withdraw consent</b> - You have the right to withdraw consent from processing of your Personal Information at any time after you have provided your consent to us.</li> <li>• <b>Right of grievance redressal</b> - You have the right to have readily available means of grievance redressal provided by us in respect of any act or omission made by us regarding the performance of our obligations in relation to your Personal Information or the exercise of your rights. If you are not satisfied with our response to your grievance, you may escalate your complaint to the Data Protection Board of India, in accordance with applicable law.</li> <li>• <b>Right to nominate</b> - You have the right to nominate any other individual, who shall, in the event of your death or incapacity, exercise the rights of the data principal.</li> </ul> <p>When exercising your rights, you shall perform the following duties:</p> <ul style="list-style-type: none"> <li>• To comply with the provisions of all applicable laws for the time being in force while exercising your rights;</li> <li>• To ensure not to impersonate another person while providing your Personal Information for a specified purpose;</li> <li>• To ensure not to register a false or frivolous grievance or complaint with us; and</li> <li>• To furnish only such information as is verifiably authentic, while exercising the right to correction or erasure.</li> </ul>
--	--

## OCEANIA PRIVACY

If you are outside of Australia and New Zealand, please contact [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com) to inquire about the privacy rights that may be available to you.

For residents of Australia and New Zealand, you have the right to request access or correction to your Personal Information held by Convergint, or to make a complaint about the way we have handled your Personal Information. To seek access to your Personal Information or to make a complaint, please email [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com) providing your name and contact details, and explaining the request or complaint. Convergint will endeavour to provide a response within 30 calendar days of becoming aware of a request. Convergint may decline a request in certain circumstances in accordance with applicable laws, including if there are existing or anticipated legal proceedings between Convergint and the person requesting it, or another identified third party.

Personal Information may be disclosed to related Convergint entities and service providers located overseas. Where this occurs, Convergint takes reasonable steps to ensure overseas recipients handle Personal Information in accordance with applicable privacy laws.

If you are not satisfied with Convergint's response, Australians may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) by calling 1300 363 992 or visiting the OAIC's website at <https://www.oaic.gov.au/>. If you are in New Zealand, please contact the New Zealand Privacy Commissioner via their website at <https://www.privacy.org.nz/your-rights/making-a-complaint-to-the-privacy-commissioner/>.

## LATAM PRIVACY

### ARGENTINA PRIVACY

If you are a resident of Argentina, you have certain rights under the Personal Data Protection Law No. 25,326 ("PDPL"), its Regulatory Decree No. 1558/2001, and supplementary rules and regulations issued by the Argentine data protection authority, as set forth below. This section applies to both individuals and legal entities whose data is being processed.

**Data Controller.** The data controller responsible for the processing of your Personal Information is Seal Solucion de Integracion SRL, with its registered address in Argentina.

**Provision of Personal Information.** Providing Personal Information is voluntary; however, failure to provide certain information, or providing inaccurate information, may limit our ability to provide you with our products or services, or to maintain our business relationship with you

**Lawful Basis:** Under the PDPL, we must have a lawful basis for the processing of your Personal Information. Depending on the circumstance, we may rely on one or more of these legal bases:

- **Your consent** - where we obtain your prior, express, and informed consent. By reading and acknowledging this Policy, you hereby provide your consent to our processing of your Personal Information in accordance with this Policy.

- **Unrestricted public-access sources** - where your Personal Information is obtained from publicly available sources.
- **Legal obligation** - where it is necessary to comply with applicable government powers or by virtue of a legal obligation.
- **Basic identifying data** - where your Personal Information consists of lists limited to name, identity document, taxpayer or pension identification number, occupation, date of birth, and domicile.
- **Contractual relationship** - where your Personal Information arises from a contractual, scientific, or professional relationship with you, and it is necessary for the development or fulfillment of such relationship.

**International Data Transfer:** Where the transfer of your Personal Information to third parties located outside Argentina is required, please note that such countries may not offer levels of personal data protection equivalent to those provided under the PDPL in Argentina. By accepting this Privacy Policy, you expressly consent to such international data transfer, if necessary.

**Privacy Rights:** If you are a resident of Argentina, you have the following rights under the PDPL:

- **Information** - You have the right to be informed, prior to the collection of your data, of the purpose of the processing and its recipients, the existence of the database, the identity and domicile of the data controller, whether providing the information is mandatory or voluntary, and the consequences of providing or refusing to provide your data.
- **Access** - You have the right to obtain access to your Personal Information within ten (10) calendar days of your request.
- **Rectification, Update, and Deletion** - You have the right to request the rectification, update, or deletion of your Personal Information when it is inaccurate, incomplete, outdated, or no longer necessary for the purpose for which it was collected. The data controller must proceed within five (5) business days of receiving the request. Deletion shall not proceed when it may cause harm to the rights or legitimate interests of third parties, or when there is a legal obligation to retain the data.
- **Confidentiality** - You have the right to request that your Personal Information be treated as confidential.
- **Complaints** - THE AGENCY FOR ACCESS TO PUBLIC INFORMATION, in its capacity as Control Authority of the PDPL, has the power to deal with complaints and claims filed by those affected in their rights for breach of the regulations in force regarding the protection of personal data.

To exercise your rights, please send an email to [dataprotectionofficer@converjint.com](mailto:dataprotectionofficer@converjint.com) specifying your request and providing details to verify your identity.

## CHILE PRIVACY

If you are a resident of Chile, the following information is applicable to you. Converjint Chile Servicios de Integración SpA, RUT 76.962.871-1, legally represented by Andrea Gutiérrez Rojas, national identity card N° 12.722.406-4, domiciled in the city of Santiago, Las Condes, Cerro El Plomo 5855, Office 307, processes your personal data in accordance with Law N°19.628 on the Protection of Private Life and its amendments introduced by Law N°21.719 on Personal Data Protection (together the "Personal Data Protection Law" or "LPDP"), Chile's Political Constitution and other applicable regulations.

During the legal vacancy period prior to the full entry into force of Law N°21.719, Convergent will apply the standards introduced by said law to the greatest extent possible, in accordance with the implementation regime established by Chilean regulations.

### **Lawful basis for processing:**

According to the LPDP, the processing of your personal data must be justified on a lawful basis recognized by law. Depending on the processing operation in question, Convergent may invoke the following lawful bases:

- **Consent:** When you have given your free, informed, specific, and unambiguous consent for the processing of your Personal Data for one or more specific purposes. When the processing is based on your consent, you have the right to revoke it at any time, without affecting the lawfulness of the processing carried out prior to said revocation (Art. 12, LPDP).
- **Execution or performance of a contract:** When the processing is necessary for the execution or performance of a contract to which you are a party, or for the adoption of pre-contractual measures at your request (Art. 13 c), LPDP).
- **Compliance with a legal obligation:** When the processing is necessary to comply with a legal or regulatory obligation applicable to Convergent (Art. 13 b), LPDP).
- **Legitimate interests:** When the processing is necessary for the satisfaction of legitimate interests of Convergent or a third party, provided that this does not affect the rights and freedoms of the data subject. When this basis is invoked, Convergent must carry out the corresponding proportionality assessment, and you may request information at any time regarding the legitimate interest that justifies it (Art. 13 d), LPDP). This basis will be fully available upon the entry into force of Law N° 21.719.
- **Formulation, exercise or defense of rights in court:** When the processing is necessary for the formulation, exercise or defense of a right before courts of justice or public bodies (Art. 13 e), LPDP).

The Personal Information processed, sources from which we obtain Personal Information, our data processing activities and purposes, data transfers, data protection measures, and data retention practices are described in the main portion of this Policy, above.

### **Data subjects rights concerning the processing of their personal data:**

If you reside in Chile, you are entitled to the following rights regarding the processing of your personal data. Please note that the exercise of these rights are subject to the conditions and exceptions established by the LPDP:

- **Right of access:** You may request confirmation as to whether your personal data is being processed and, if so, obtain a copy of such data and information regarding: the purposes of the processing; the categories of recipients to whom the data has been or will be communicated or transferred; the retention period; the source of the data; and, when processing is based on legitimate interest, what these interests are (Art. 5, LPDP).
- **Right to rectification:** You may request that we rectify your personal data when it is inaccurate, outdated, or incomplete (Art. 6, LPDP).
- **Right to erasure:** You may request the deletion of your personal data under certain circumstances, including, among others, when it is no longer necessary for the purposes for which it was collected, when you have withdrawn your consent and there is no other legal basis for the processing, or when the data has been processed unlawfully (Art. 7, LPDP).

- **Right to object:** You may object to the processing of your personal data in certain cases, particularly when the processing is based on Convergint's legitimate interest or when the data has been obtained from publicly accessible sources (Art. 8, LPDP).
- **Right to object automated individual decision-making:** You may object to decisions based solely on the automated processing of your personal data—including profiling—that produce legal effects concerning you or significantly affect you, unless one of the legal exceptions applies (Art. 8 bis, LPDP).
- **Right to restriction of processing:** You may request the temporary suspension of the processing of your personal data while a request for rectification, erasure, or objection is pending resolution (Art. 8 ter, LPDP).
- **Right to data portability:** When processing is carried out by automated means and is based on your consent, you may request to receive your personal data in a structured, commonly used, and machine-readable electronic format, and request that it be transmitted directly to another data controller where technically feasible (Art. 9, LPDP).
- **Right to withdraw consent:** When processing is based on your consent, you may withdraw it at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal (Art. 12, LPDP).

#### **How to exercise your rights:**

To exercise any of the rights described above, please send a written request to [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com). Your request must include: your full name, the specific right you wish to exercise and information that allows for the identification of the personal data or the processing to which your request refers. Where applicable, you may attach supporting documentation for your request. Convergint will acknowledge receipt of your request and provide a written response within 30 calendar days following the date of receipt of all necessary documentation. This period may be extended once for up to an additional 30 calendar days when required by the complexity or volume of the requests, in which case you will be notified in a timely manner.

When required by law, Convergint will take reasonable measures to verify the applicant's identity before processing the request.

#### **Right to complain to the authority:**

If you consider that the processing of your personal data does not comply with the applicable regulations, you have the right to complain with the competent personal data protection authority in Chile. Once it comes into force, this authority will be the Personal Data Protection Agency (APDP). During the transition period, supervisory functions will be exercised in accordance with the current institutional framework.

Additionally, you may file a judicial claim directly before the competent Court of Appeals should you consider that an administrative act or a final resolution issued by the APDP is unlawful.

#### **COLOMBIA PRIVACY**

If you are located in Colombia, your Personal Data is processed in accordance with the Ley 1581 de 2012 and its regulatory decrees.

The data controller is CONVERGINT COLOMBIA SERVICIOS DE INTEGRACIÓN S.A.S., with registered address in Bogotá D.C., Colombia.

You have the right to:

- Access your Personal Data
- Update and rectify inaccurate data
- Request deletion when applicable
- Revoke authorization where legally permitted
- File complaints before the Superintendencia de Industria y Comercio

Requests may be submitted to: [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com)

## **MÉXICO PRIVACY**

If you are a resident of Mexico, this Annex applies to you. In the event of any inconsistency between this Annex and the main Notice, this Annex shall prevail. Convergint processes Personal Data in accordance with the Ley Federal de Protección de Datos Personales en Posesión de los Particulares, its Regulations, and other applicable Mexican data protection laws (the “Mexican Data Protection Law”).

### **Data Controller**

The data controller is the applicable Convergint entity engaging with you in Mexico (the “Controller”).

### **ARCO Rights**

You have the right to:

- Access your Personal Data;
- Rectify inaccurate or incomplete data;
- Cancel your Personal Data when legally applicable;
- Object to the processing of your Personal Data;
- Revoke your consent where permitted by law.

Requests must be sent to: [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com) with your name, ID (or legal representation), description of data, and a contact method.

### **Sensitive Personal Data**

Express consent will be obtained where legally required.

### **Transfers**

Data may be transferred nationally or internationally as described in the main Policy, above. Consent will be obtained if required.

## Complaints

Complaints may be filed with the **INAI**.

## BRAZIL PRIVACY

If you are a supplier, vendor, service provider, or other third party located in Brazil, this section applies to you. In the event of any inconsistency between this section and the main Policy, this section shall prevail with respect to the processing of Personal Information subject to the Brazilian General Data Protection Law (Law No. 13,709/2018 – “LGPD”).

The processing of personal data will be carried out by **Convergint Comércio e Serviços de Tecnologia Ltda** (CNPJ: 58.619.404/0001-48).

For questions regarding the processing of your Personal Information or to exercise your rights, please contact the Data Protection Officer (“DPO”) appointed at <https://convergint.com.br/lgpd/>, via email at [privacidade-br@convergint.com](mailto:privacidade-br@convergint.com).

This email address constitutes an official communication channel for privacy-related inquiries, complaints, and suspected violations of the LGPD.

**Lawful Basis:** Under the LGPD, processing of Personal Information must rely on a lawful basis. In Brazil, Convergint primarily relies on

- Performance of a contract or pre-contractual procedures related to supplier onboarding, due diligence, and commercial relationship management;
- Compliance with legal or regulatory obligations, including tax, accounting, anti-corruption, compliance, and audit requirements;
- Regular exercise of rights in judicial, administrative, or arbitration proceedings;
- Legitimate interests, including risk management, fraud prevention, compliance controls, and security monitoring, subject to necessity and proportionality assessments;
- Consent, where specifically required by law. Where consent is relied upon, it may be revoked at any time, subject to legal or contractual limitations.

**Sensitive Personal Data:** Processing of Sensitive Personal Data (including health data, biometric data, trade union membership, racial or ethnic origin, religious belief, political opinion, or sexual orientation) shall be limited to what is strictly necessary and only where (i) required to comply with legal or regulatory obligations; (ii) necessary for fraud prevention, compliance investigations, or risk mitigation; (iii) required for access control or security measures, including the use of biometric systems, where applicable; or (iv) based on specific and highlighted consent, where legally required under the LGPD.

**Data Sharing:** Personal Information may be shared with affiliated entities, service providers, subcontractors, clients, or competent authorities in accordance with the main Policy and applicable law. Where third parties process Personal Information on behalf of Convergint, such parties shall act in compliance with the LGPD and applicable contractual obligations. Convergint adopts appropriate contractual safeguards to ensure that processors implement adequate technical and organizational measures to protect Personal Information.

**Processor Responsibility:** Convergent shall be responsible for damages arising from unlawful processing where required under the LGPD, except where it can demonstrate that it is not responsible for the event giving rise to the damage.

Personal Information will not be sold.

**International Data Transfers:** Personal Data may be transferred outside Brazil, including to other Convergent group entities or cloud service providers. In accordance with Articles 33–36 of the LGPD, such international transfers will occur only where (i) the destination country provides an adequate level of data protection as recognized by the Brazilian Data Protection Authority (ANPD); (ii) appropriate safeguards are implemented, including standard contractual clauses or other transfer mechanisms approved or recognized by the ANPD; or (iii) another lawful basis for international transfer under the LGPD applies.

The use of cloud infrastructure hosted outside Brazil constitutes an international data transfer under Brazilian law. Appropriate technical, organizational, and contractual safeguards are implemented to protect such transfers.

**Rights:** Under the LGPD, you have the right to (i) Confirmation of the existence of processing; (ii) Access to Personal Information; (iii) Correction of incomplete, inaccurate, or outdated data; (iv) Anonymization, blocking, or deletion of unnecessary or excessive data or data processed in non-compliance with the LGPD; (v) Portability, where technically feasible and as regulated by the ANPD; (vi) Deletion of Personal Information processed based on consent, subject to legal retention obligations; (vii) Information regarding public and private entities with which Personal Information has been shared; (viii) Information about the possibility of denying consent and the consequences thereof; and (ix) revocation of consent.

Requests may be submitted to [privacidade-br@convergent.com](mailto:privacidade-br@convergent.com). We may require identity verification prior to fulfilling any request. Certain requests may be denied where the retention of Personal Data is required by applicable law, including tax, accounting, regulatory, or statutory limitation obligations.

Upon request, you may also obtain information regarding the specific purposes of processing, the form and duration of processing (subject to trade secret limitations), and the identification and responsibilities of processing agents, as required under Brazilian law.

You also have the right to lodge a complaint with the Brazilian Data Protection Authority (ANPD).

**Data Breach Notification:** Under the LGPD, security incidents that may result in relevant risk or damage to data subjects must be communicated to the ANPD and, where applicable, to affected individuals. Convergent maintains procedures to assess, manage, and notify security incidents in accordance with Brazilian law.

## OTHER INFORMATION

### Third Party Components, Sites, and Links

Our sites may have features such as, plugins, widgets, or and other tools made available by third parties that may result in information being collected or shared between us and the third party, including social media sites.

This Site may contain links to other websites which are governed by separate terms and policies. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy policy applies solely to information collected by the locations where this privacy policy is posted or referenced.

## **Updates to this Privacy Policy**

This Policy is kept under regular review and may be updated from time to time. When we make changes to this Policy, we will change the "Last Updated" date above. If a material change is made to this Policy, we may provide notice to you as required by applicable law, such as by posting notice of that change on the first page of this Policy or on our homepage, or by emailing your email address of record with us. Please review this page periodically for updated information on our privacy practices.

## **Questions about the Privacy Policy**

If you have any questions or complaints about this privacy policy, the practices of this site or your interactions with this site, or to exercise available privacy rights (including, without limitation, your right to withdraw consent, where we rely on your consent to process your Personal Information), please contact [dataprotectionofficer@convergint.com](mailto:dataprotectionofficer@convergint.com), submit your request via webform at <https://www.convergint.com/about/contact-us/>, specifying "Privacy Request – Attn: Legal" in the body of the request, or submit your request via toll free number at 1-877-641-8181.