

UK / EU Privacy Policy

Introduction

At Tierion, we and our affiliated undertakings (“Tierion”, “we”, “us” and/or “our”) value the relationship we have with you. Protecting the confidentiality and integrity of personal data is a responsibility that Tierion takes very seriously.

This Privacy Policy explains how we collect, use, share, store and otherwise process your personal data when you are located in the United Kingdom or European Union (“EU”) and you use this website or our blog or App (together, the “Tierion Platforms”) or we otherwise receive your personal data in connection with our relationship with you or the business you work for. It also explains your rights under applicable data protection laws, including the European Union’s (“EU”) General Data Protection Regulation (“GDPR”) and the United Kingdom’s (“UK”) Data Protection Act 2018 (the “Data Protection Laws”). If you are located in the United States of America please see our United States (“US”) Privacy Policy found here.

Where the GDPR applies to the processing of your personal data, the data controller for your personal data is Tierion, unless we advise you otherwise. The data controller decides how personal data about you is processed and why.

We keep this Privacy Policy under regular review, and we will advise you of any updates or changes to this Privacy Policy, from time to time.

Information We Collect; Purpose of Processing

We regularly collect personal data in the context of our business activities. The types of personal data relating to you that we may collect, and the purposes for which we process this data, depends on the nature of your interaction with us. Please read the table below for more information.

Under the GDPR, we are required to specify the legal basis under which we are allowed to process your personal data. Generally, we may process your personal data to perform a contract with you or for your benefit, for the establishment, exercise or defence of legal claims or proceedings or to comply with our legal and regulatory obligations. Other bases for processing your personal data are described below.

How we obtain your personal data	Types of personal data that we may process	Purpose / legal basis for processing
When you browse or interact with the Tierion Platforms, including through the use of cookies (for more information, read the cookies section of our US Privacy Policy found here).	<ul style="list-style-type: none">• Name, title, gender• Contact details (email address, physical address, phone number)• Your employer• Description of yourself, your position, your requirements or comments, and your relationship to a person• Technical information (including your IP address, domain name, type of browser and operating system used)• Your preferences	Legitimate interests: <ul style="list-style-type: none">• Managing business communications• Maintaining and managing the Tierion Platforms• Responding to your communication(s) with us.• Improving the quality of our communications and interactions with our visitors• Understanding visitor behaviour patterns to improve the Tierion Platforms
When you provide personal data to us in correspondence and communications and through forms and contracts submitted to us or executed with us.	<ul style="list-style-type: none">• Name, title, gender• Contact details (email address, physical address, phone number)• Information you disclose to us, which may include special categories of data• Information from identification documents	Contract: <ul style="list-style-type: none">• Fulfilling our obligations under our engagement or other agreement with you Legitimate interests: <ul style="list-style-type: none">• Managing business communications• Responding to your communication(s) with us.

<p>When we provide products or services to you, including taking and managing payments, fees and charges.</p>	<ul style="list-style-type: none"> • Name, title, gender • Contact details (email address, physical address, phone number) • financial information, credit card information, wallet address and public key 	<p>Contract:</p> <ul style="list-style-type: none"> • Fulfilling our obligations under our engagement or other agreement with you <p>Legitimate interests:</p> <ul style="list-style-type: none"> • Managing business finances
<p>If you offer or provide services to us.</p>	<ul style="list-style-type: none"> • Name, title, position, employer, qualifications, physical address, email address, phone numbers • Any other personal data disclosed to us 	<p>Legitimate Interests:</p> <ul style="list-style-type: none"> • Running and promoting our business • Managing and preserving records of services or advice we have received and authorising further services <p>Contract:</p> <ul style="list-style-type: none"> • Fulfilling our obligations under our agreement with you and/or your employer <p>Legal obligation:</p> <ul style="list-style-type: none"> • Monitoring the risk of modern slavery in our supply chain

Automatically Collected Data

When you interact with us through the Tierion Platforms, we automatically collect information about you through cookies (small text files placed on your device). Please read our US Privacy Policy found here to learn more about how we use cookies. Our servers also record information (“log data”), including information that your browser automatically sends whenever you visit the Tierion Platforms. This log data includes your Internet Protocol (“IP”) address (from which we can discern the country you are connecting from at the time you visit the Tierion Platforms), browser type and settings, and the date and time of your request.

Where the information that we collect automatically on the Tierion Platforms is personal data, our legal basis for the use of this information is that it is necessary for the purposes of our legitimate interests in maintaining the safe operation of the Tierion Platforms and learning how Tierion Platforms visitors interact with the Tierion Platforms to improve your use of it.

How We Share Your Personal Data

We share your information as follows:

- Third party service providers: Third parties who provide services to us have access to your personal data, for example, we engage providers of website analytics, hosting and cloud computing services and other IT services, background checks, talent management and recruitment services, in addition to other administrative services.
- Professional advisers. We may disclose your personal data with our professional advisers (for example, accountants and attorneys) who assist us with the running of our business.
- Administrative and legal reasons. We may disclose personal data as we deem necessary and appropriate under applicable laws, such as to comply with a subpoena, bankruptcy proceedings, or similar legal process; in response to lawful requests by public, governmental and regulatory authorities.
- Business transfers. We may disclose and transfer your information and data to a third party: (a) if we assign our rights regarding any of the information to a third party or (b) in connection with a corporate merger, consolidation, restructuring, sale of certain of our ownership interests, assets, or both, or other corporate change, including without limitation, during the course of any due diligence process.

- Tierion entities. When using your personal data for the purposes described above, we may share your personal data with other Tierion affiliate entities around the world. Please read the International Data Transfers section below for more information on how we transfer your personal data.

International Data Transfers

For the purposes described in this Privacy Policy, we will transfer your personal data from the UK and/or the European Economic Area (EU Member States, Iceland, Liechtenstein and Norway) (“EEA”) to us in the US and to other third parties outside of the EEA or the UK. The level of information protection in countries outside the UK and EEA may be less than that offered within the UK and EEA. When we transfer your personal data outside of the EEA or the UK, we will do this in accordance with applicable data protection laws and will take appropriate safeguards to ensure the integrity and protection of your personal data wherever processed.

Retaining Your Personal Data

We retain your personal data only for as long as is necessary to fulfil the purposes for which it was collected and processed, in accordance with our retention policies, and in accordance with applicable laws or until you withdraw your consent (where applicable). To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we use your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymize your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

Protecting Your Personal Data

We use a variety of technical and organizational measures to protect against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, your personal data, in accordance with our internal security procedures and applicable law. Personal data may be stored on our own technology systems or those of our service providers or in paper files.

What are your rights?

You have the following rights with respect to your personal data:

- **Right of access:** If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data along with certain other details. If you require additional copies, we may charge a reasonable fee.
- **Right to correct or request deletion:** You may ask us to correct, delete or remove your personal data.
- **Right to object to or restrict processing:** You may object to the processing of your personal data and, where you consented to processing, you may withdraw your consent. You may also ask us to restrict or ‘block’ the processing of your personal data in certain circumstances, such as where you contest its accuracy or object to us processing it. If you exercise your rights, we will respect your decision in accordance with our legal obligations.
- **Right to data portability:** In circumstances where our processing is carried out by automated means you have the right to obtain personal data from us that you consented to give us or that was provided to us as necessary in connection with our contract with you.
- **Right to withdraw consent:** You have the right to withdraw consent to us using your personal data (where consent is relied on by us) and to opt out of receiving marketing materials.
- **Right to lodge a complaint with the data processing authority:** If you have a concern about our privacy practices, including the way we handled your personal data, you can report it to your supervisory authority.

You may exercise your rights under the GDPR by contacting us as indicated under the ‘How to Contact Us’ section below.

How To Contact Us

If you have any questions about our UK / EU Privacy Policy, or if you would like to access personal data we hold about you or exercise your other rights under applicable law, you can contact us at privacy@tierion.com