

iMerit PRIVACY POLICY

iMerit Group of Companies

Title	iMerit Privacy Policy
Document Type	Policy
Version	2.0
Effective Date	January 6, 2025
Approved by	iMerit Board
Distribution	Public

REVISION HISTORY

Version Number	Version Date	Description of Change
1.0	April 1, 2020	Initial Policy Approved
1.1	August 11, 2023	DPF consistent principles updated
1.2	August 24, 2023	Onward Transfer clauses updated
2.0	January 6, 2025	Sections related to Data Subject Rights, Breach Notification & Cross-Border Transfers added

Your privacy is important to us. It is iMerit policy to respect your privacy regarding any information we may collect from you across our website, <https://imerit.net>, and other sites we own and operate.

To improve your experience on our site, we may use 'cookies'. Cookies are an industry standard, and most major websites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your visit to our website. You may refuse the use of cookies by selecting the appropriate settings on your browser.

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

Personal Data means any information that relates to an identified or identifiable individual, including but not limited to names, email addresses, location data, online identifiers, and other data that can directly or indirectly identify a person.

We only ask for personal information when we truly need it to provide a service to you. We collect it by fair and lawful means, with your knowledge and consent. We also let you know why we're collecting it and how it will be used. We only retain collected information for as long as necessary to provide you with your requested service. What data we store, we'll protect within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification. We don't share any personally identifying information publicly or with third parties, except when required to by law.

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and practices of these sites and cannot accept responsibility or liability for their respective privacy policies. You are free to refuse our request for your personal information, with the understanding that we may be unable to provide you with some of your desired services.

iMerit complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, as set forth by the U.S. Department of Commerce. iMerit has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, **iMerit** commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, should first contact iMerit at: dpo@imerit.net

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, **iMerit** commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF.

Disclosure of Personal Information to Third Parties

At iMerit we understand the significance of transparency in disclosing how your personal information is shared. We may disclose your personal data to carefully selected third parties for specific purposes that

contribute to enhancing our services and meeting your needs. These third parties may include trusted service providers, partners, and affiliates who assist us in delivering our products and services effectively. The disclosure of your information is strictly limited to purposes such as customer support, data analytics, marketing, and technical assistance. Rest assured that we prioritize your privacy and only share the information necessary to facilitate these functions. We diligently assess and select our partners based on their commitment to data security and privacy standards. If you have any queries regarding the types of third parties we engage with or the purposes of such disclosures, please do not hesitate to contact us.

Right of individuals to access their personal data

Individuals have the right to access their personal data and supplementary information. The right of access allows individuals to be aware of and verify the lawfulness of the processing. All requests from subjects for access to their data should be submitted immediately to the **iMerit Data Protection Officer**.

Control Over Personal Data Use and Disclosure

At iMerit, we believe in putting you in control of your personal data. We are committed to providing you with choices and means to manage the use and disclosure of your personal information. You have the option to adjust your preferences, limit certain uses of your data, and control how your information is shared with third parties. We respect your choices and are dedicated to ensuring that your personal data is handled in a manner that aligns with your preferences. If you have any questions about how to exercise these choices or require further information, please reach out to us. Your privacy matters, and we are here to provide you with the means to tailor your experience according to your preferences.

Federal Trade Commission (FTC) Investigatory and Enforcement Powers

At iMerit, we prioritize the protection of your privacy and the security of your personal information. As a commitment to maintaining the highest standards, please be aware that our organization is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). This means that, in the event of any concerns or discrepancies regarding our privacy practices, the FTC has the authority to investigate and enforce compliance with applicable privacy regulations. We are dedicated to cooperating fully with regulatory authorities to ensure the safeguarding of your data and the preservation of your rights. If you have any inquiries or require more information about our privacy practices, please do not hesitate to contact us.

Invoking Binding Arbitration

At iMerit, we value your privacy and are committed to providing fair and transparent resolution processes. Under specific circumstances, you have the option to invoke binding arbitration as an alternative to pursuing legal action. This means that, if agreed upon, disputes related to the handling of your personal information can be resolved through arbitration rather than through the courts. Binding arbitration offers a streamlined and efficient resolution process. Please note that this option is subject to certain conditions and requirements. We want to ensure that your rights are respected, and we are dedicated to offering mechanisms that prioritize your satisfaction. If you wish to explore the possibility of invoking binding arbitration, please contact us for further details.

Requirement to disclose personal information in response to lawful requests

At iMerit we are committed to safeguarding your privacy and protecting your personal information. In certain situations, we may be required to disclose your personal data in response to lawful requests from public authorities, including those related to national security or law enforcement requirements. Please be aware that these requests will only be honored when they comply with relevant legal procedures and regulations. While we respect your privacy, there are instances when we must fulfill our legal obligations. We assure

you that any such disclosure will be conducted with the utmost care and adherence to legal and ethical standards. We remain dedicated to maintaining the highest level of transparency and integrity in all our practices.

We process your personal data on the basis of your consent, contractual necessity, legal obligations, and/or our legitimate interests as permitted by applicable laws.

Liability in cases of onward transfers to third parties

We may pass your personal data on to third-party service providers contracted to IMERIT in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only for the legitimate reasons they were obtained for originally. When they no longer need your data, they will dispose of the details in line with IMERIT's procedures as set out in the contracts signed with them. Whenever we pass your personal data on to third-party service providers contracted to IMERIT we inform individuals about each element listed in the Notice Principle, including iMerit's liability in cases of onward transfers to third parties. The Accountability for Onward Transfer Principle explains that to transfer personal information to a third party acting as a controller, a participating organization must, among other things, comply with the Notice and Choice Principles. The Recourse, Enforcement and Liability Principle explains that, in the context of an onward transfer, iMerit has responsibility for the processing of personal information it receives under the DPF Principles and subsequently transfers to a third party acting as an agent on its behalf. iMerit shall remain liable under the DPF Principles if its agent processes such personal information in a manner inconsistent with the DPF Principles, unless the organization proves that it is not responsible for the event giving rise to the damage.

Data Subject Rights and Requests

In addition to the right of access, you may have the right to rectify, erase, restrict, or object to the processing of your personal data. You may also request to receive a copy of the personal data we hold about you in a structured, commonly used, and machine-readable format.

To exercise your rights or raise concerns, please contact our Data Protection Officer by emailing dpo@imerit.net with the subject line 'Data Rights Request'. We may need to verify your identity before fulfilling your request.

Data Retention Periods

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including satisfying legal, regulatory, tax, accounting, or reporting requirements. After this period, the data is securely deleted or anonymized.

Cross-Border Transfers

When transferring personal data to countries outside your jurisdiction, we ensure adequate safeguards are in place, such as standard contractual clauses (SCCs), binding corporate rules (BCRs), or data transfer agreements as required by applicable data protection laws.

Data Breach Notification

In the event of a data breach that poses a risk to your rights and freedoms, we will notify affected individuals and relevant authorities in accordance with applicable laws.