

## Privacy Statement of Attached™

This Privacy Statement concerns the processing of data carried out by Attached B.V. and its subsidiaries (including Attached – Language Intelligence and Transcreation Inc.) (collectively, “Attached”, “we” or “us”).

Attached respects the privacy of our business contacts and users of our website (<https://attachedglobal.com/>). We ensure that the personal information you provide to us is treated confidentially in a secure environment.

This Privacy Statement applies to the services provided by Attached, consisting of the delivery of language services in the broadest sense.

Providing personal information or authorizing a third party to disclose personal information to us signifies your consent to Attached’s collection, use and disclosure of personal information in accordance with this Privacy Statement. If you provide personal information to us about a third party or authorize a third party to disclose personal information to us, you agree that you were authorized to do so.

For the purposes of this Privacy Statement, “personal information” or “personal data” means information that can identify an individual directly or through other reasonably available means. “Personal information” or “personal data” does not include information that is used for the purpose of communicating or facilitating communication with an individual in relation to their employment, business, or profession. Notwithstanding anything to the contrary herein, the meaning of “personal information” and “personal data” shall be interpreted in a manner that conforms with the minimum requirements of applicable privacy legislation.

### What data do we hold?

Personal information may be collected in a number of ways, including: in person, over the phone, by mail, when creating an account on our Client portal, by fax, over the Internet (including from the website, by e-mail, or through any of our applications or other software that we provide), and from third parties whom you have authorized to disclose personal information to us.

This involves data such as:

- first name and surname
- gender
- address details
- telephone number
- e-mail address
- employer / company where you work

It is also possible that the documents you offer us for processing contain personal data regarding you or third parties. This data may go beyond the above list.

### For what purposes do we use your data?

Our business operations consist in the provision of language services. We use your personal data in order to provide these services in an adequate manner. As part of the execution of an assignment, or during the

quotation phase that precedes it, we need the personal data of a contact person. In addition, we have a legitimate interest in processing your personal data while performing our services because we may need to contact you about the contents of the documents.

Attached also processes your personal data for the purpose of informing you about our (new) services, inviting you to meetings or sending you mail shots. These communications require your consent.

We also collect and use personal information so we can: (i) provide, maintain, and improve our products and services, which includes using the information to fulfill orders, verify your identity, process payments, allocate resources, and otherwise run and manage our business in the ordinary course; (ii) provide information to our employees, contractors, and affiliates to allow them to perform services on our behalf, including the provision of personal information to service providers engaged by Attached; (iii) send you newsletters or other communications to which you have subscribed or may be interested; (iv) comply generally with privacy laws and all other applicable regulatory requirements; (v) understand the demographics, interests, usage patterns, and other characteristics of customers and to track and analyze trends and patterns, including through the aggregation of personal information; (vi) administer surveys, contests, draws, and raffles; (vii) offer you tailored content, including advertisements and promotions; and (viii) assist you when you contact our customer support services, including to direct your questions to appropriate individuals, investigate and address any of your concerns, and to improve and monitor our customer support responses. We may also use your personal information for purposes that are otherwise consistent with the terms of this Privacy Statement or that are permitted or required by law, and for purposes for which you have otherwise provided consent.

If you provide us with a third party's personal data, it is up to you to inform us about this. In that case, we will ask you to anonymize or pseudonymize this data, or to indicate why you are unable to do so. Alternatively, we can anonymize or pseudonymize this data at your expense. We will document this.

If anonymization or pseudonymization is not possible, we will regard the personal data as a part of the assignment you granted us and will process the data for that purpose, even if it involves special personal data. We will assume that you are entitled to provide us with that personal data. We do not process criminal data, unless you can demonstrate that you are entitled to provide such data.

Attached does not use automated decision-making processes.

### **For how long do we retain your data?**

Attached will not retain your personal information for longer than the duration of the statutory retention period. At any time, you may request to withdraw the storage of your documents in our translation system. Upon such request, the data will be retained for a maximum of another six months. If different retention periods apply, these will be communicated to you in writing.

After the end of the retention periods, the personal data will be destroyed or archived.

## Sharing with others

Attached does not sell your data to third parties.

The staff members in our employment have a duty of secrecy.

We may share your personal information with our service providers in order for them to provide services to or on behalf of Attached, including processing and storage. These may include, for example, cloud storage providers and data analytics providers. To that end, when you provide personal information to Attached, the information may be stored on servers hosted or owned by a third party. If you use a credit or debit card or other method of payment for your purchase, information with respect to your payment method is required to process your payment. We do not store your payment information. Your payment information will be provided directly to our third-party payment provider.

We may (i) share your personal information with our affiliates; (ii) combine information internally across our affiliates or our different products and services; and (iii) combine personal information with demographic information, publicly available records and other third-party information sources. We may use this information to provide you with a customized experience, to promote and develop products and services available through Attached or its affiliates, or as otherwise permitted by this Privacy Statement.

If you post a review, make a comment, or otherwise submit personal information on a public forum such as social media accounts or public forums on the website or other applications, your communications may be viewable by the public.

We may also disclose personal information in situations where we are legally required or permitted to do so. The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements or to enforce your rights or to investigate suspicion of unlawful activities. In some instances, such as a legal proceeding or court order, we may also be required to disclose your personal information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the disclosure request have legitimate grounds to do so. We may release certain personal information when we believe that such release is reasonably necessary to protect the rights, property or safety of ourselves and others.

We may use and disclose your personal information to third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of our business or assets (including accounts) for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples, permitting such parties to determine whether to proceed or continue with the transaction, fulfilling any reporting or audit requirements to such parties, and/or disclosing personal information as part of concluding a sale or transfer of assets. Our successors and assigns may collect, use and disclose your personal information for substantially the same purposes as those set out in this Privacy Statement.

We may share personal information in the aggregate with third parties. For example, we may disclose the number of users that have been exposed to or clicked on advertisements. We may also disclose anonymized information about your use of Attached. For example, if you engage in a transaction in connection with

Attached, we may publicly disclose information about the transaction in a manner that does not disclose Personal Information.

We conclude data processing agreements with companies and other third parties which process personal data on our instructions, so as to ensure the same level of protection and confidentiality of the data.

## **Cookies**

A cookie is a small text file that is stored on the browser of your computer, tablet or smartphone the first time you visit a website. The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your consent. You can change or withdraw your consent at any time via the Privacy Statement page on our website.

## **Social media**

Our website includes buttons of various social media organizations such as Facebook, Twitter and LinkedIn. These buttons work by means of codes originating from these social media organizations themselves. If you use the buttons on our website, these codes may trigger the placement of cookies, which cookies can then be read by the social media organizations concerned. We are not responsible for these cookies and the possible data which the social media organizations gather in this way, and we refer to the statements which these social media organizations provide on this point on their own websites. Such statements may change regularly.

## **Google Analytics**

Attached uses Google Analytics for the purpose of monitoring how visitors use the website. This information does not contain personal data.

## **Accessing, adjusting or removing data**

You are entitled at any time to access, amend or restrict the personal data which we hold about you. In addition, you may request that your data be transferred or removed altogether. You also have the option to object to the data processing or to file a complaint with us. You can submit these requests via [info@attachedglobal.com](mailto:info@attachedglobal.com). Attached will respond to your request as soon as possible and in any case within one month. Alternatively, you can submit complaints to the applicable protection authority, including for residents of the European Union, the Dutch Data Protection Authority [*Autoriteit Persoonsgegevens*] via <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens>.

## **Protection of your data**

Attached takes the protection of your data seriously and has taken appropriate internal and technical measures to prevent abuse, loss, unauthorized access, unwanted disclosure and unapproved alteration. If a data leak involving personal data should nevertheless occur despite the measures taken, Attached will take the requisite steps and inform you accordingly where necessary.

If you have the impression that your data is not properly secured, if there are indications of abuse or if you require more information about the protection of the personal data we have gathered, then please do not hesitate to contact us via [info@attachedglobal.com](mailto:info@attachedglobal.com).

Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file, we will remedy any such errors on a timely basis. In the event that inaccurate information is mistakenly sent to a third party, we will communicate relevant changes to the third party where appropriate.

### **Any questions?**

If you want to ask us a question or send us your comments, then please contact us via [info@attachedglobal.com](mailto:info@attachedglobal.com).

### **Updating this Privacy Statement**

Any changes to our privacy standards and information handling practices will be reflected in this Privacy Statement in a timely manner. Attached reserves the right to change, modify, add, or remove portions of this Privacy Statement at any time. Please check this page periodically for any modifications. To determine when this Privacy Statement was last updated, please refer to the modification date at the bottom of this Privacy Statement. If at any point you do not agree with the terms of this Privacy Statement, you must not use Attached's services.

### **Personal information outside of Canada and the European Union**

Attached may perform activities outside of the European Union and outside of Canada through third parties. For example, personal information provided to our payment processors may be stored outside of the European Union and Canada. We also work with translators that are located outside of the European Union and Canada and who receive the source files for translation. You acknowledge and agree that, as a result, your personal information may be processed, used, stored or accessed in other jurisdictions and may be subject to the laws of those jurisdictions. For example, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement in other countries.

### **Legal entity**

The personal data is processed for the benefit of

Attached B.V.  
Prinses Beatrixlaan 582  
2595 BM The Hague  
The Netherlands  
+31 70 3459401  
[info@attachedglobal.com](mailto:info@attachedglobal.com)

and

Attached – Language Intelligence and Transcreation Inc.  
180 John St.  
Toronto, ON M5T 1X5  
Canada  
[info@attachedglobal.com](mailto:info@attachedglobal.com)

**Last modified on: February, 2021**