RESOLVER INC.
PRIVACY STATEMENT

Ver. 4.0
Last Updated: December 23, 2022

1. Resolver Values Your Privacy

This Privacy Statement (the "**Statement**") governs all aspects of how **RESOLVER INC.** and its affiliates (collectively "**Resolver**", "**We**", "**Us**" or "**Our**"), collect, use, maintain, disclose and process Personal Data (as defined below) from prospects, customers, suppliers, business partners and other individuals ("**Users**", "**You**" or "**Your**" and similar words).

By accessing a Resolver website, registering for events, downloading content, obtaining information from Us, communicating with Us via email, in person or through Our websites (or service providers' websites on our behalf) or information volunteered by You and/or by using any Resolver software ("**Software**"), You agree to the terms of this Statement.

We are committed to protecting the confidentiality, integrity and security of all Personal Data entrusted to Us by You. Resolver has prepared this Statement to inform You of Our policy and practices concerning the collection, use, disclosure and processing of Personal Data.

2. Personal Data that We collect

We, from time-to-time, may collect information relating to an identified or identifiable natural person ("**data subject**") who can be identified, directly or indirectly by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person ("**Personal Data**").

This includes Personal Data:

1. that You provide to Us or one of our service providers about You (in which case, We are a data controller) or about other Users, where You are permitted to do so pursuant to applicable law (in which case, We are a data processor); or
2. collected electronically about how You use a Resolver website or Our Software, via "cookies" or through Your use of any of Our Software.

"Cookies" are files or pieces of information that may be stored in Your computer's hard drive when You visit a Resolver website or use Our Software. Cookies are also used to remember that You may have already provided Personal Data to Us and as a result, they help speed up Your future activities when accessing Our websites or Our Software. We share some Personal Data obtained through cookies with third parties that provide certain services, including marketing automation services, to Us. Most Internet browsers are initially set to accept cookies. If You do not wish to accept cookies, You can set Your Internet browser to refuse cookies or to alert You when cookies are being sent.

You may have received a unique client ID and created a password in order to use Our Software. You are requested not to divulge Your client ID or password to anyone other than Your own personnel or Our personnel and then only for the purpose of permitting Our personnel to provide services to You.

In addition to cookies and Personal Data You provide to Us, We may collect other information about (i) Your visits to Our websites; and (ii) Your access to Our Software. For example, We may collect information about Your computer, such as Your IP address; the type of Internet browser You are using; the type of computer operating system You are using; the domain name of the websites from which You linked to Our websites; and usage statistics in relation to Your use of Our Software. This information will only be collected for planning, forecasting and/or evaluation purposes.

Please note that this Statement does not cover aggregated and/or anonymized data from which the identity of data subject cannot be determined. We retain the right to use any aggregated/anonymized data in any way that We determine appropriate.

We have no control over the content of third party websites that may be identified on Our websites or, if applicable, accessed through hyperlinks.

3. Your Consent

Your provision of Personal Data to Us means that You agree and consent that We may collect, use, disclose and process Personal Data that You provide in accordance with this Statement. If You do not agree with these terms, You are requested not to provide any Personal Data to Us. Certain services can only be offered if You provide Personal Data to Us and/or You may not be able to access any of Our Software. Consequently, if You choose not to provide Us with any required Personal Data, We may not be able to offer You certain services or You may not be able to access any of Our Software.

4. How We use Personal Data

We may, from time-to-time, use Personal Data that We collect from You (including through Our Software) or that You provide to Us to:

a. contact You directly regarding Our products, services and events;

b. provide You with proper access to and use of Our Software;

c. help You use Our Software;

d. contact You to provide customer service support;

e. research the effectiveness of Our corporate websites and Our marketing, advertising and sales efforts;

f. keeping You informed and up-to-date with Our products and services and events; and

g. sell or market Our products and services to You.

Our use of Personal Data is limited to these purposes. Unless permitted by law, no Personal Data about a User is collected, without an appropriate entity first obtaining the consent of the data subject to the collection, use, sharing or processing of that information.

5. Sharing Personal Data

We will use Personal Data collected from You and Users for internal purposes only. We may share Personal Data to organizations that perform services on Our behalf ("**Service Providers**"). Service Providers include sub-processors and authorized resellers of Our products and services. We shall take reasonable and appropriate steps to ensure that Personal Data provided to Service Providers (including, using standard contractual clauses, as appropriate) is processed only for the purposes of providing services to Us, under Our instruction and in a manner consistent with the relevant principles articulated in this Statement.

Please note that there are circumstances where the use or disclosure of Personal Data may be justified or permitted by law or where We are obliged to share information without consent. Such circumstances may include:

a. Where We believe in good faith that the law requires it;

b. Where We believe, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;

c. Where it is necessary to protect Our rights or property and collect any money owing;

d. Where the information is public; or

e. If We are acquired by or merged with another entity (in which case We will require such entity to assume Our obligations under this Statement).

Where obliged or permitted to share information without consent, We will not share more information than is required. We do not sell any Personal Data that We have obtained.

6. International Transfers

Resolver Inc., a Canadian legal entity domiciled in Toronto, Canada, is the primary legal entity that provides goods and services (including Software). With respect to Personal Data originating from a member state of European Economic Area (EEA) or the United Kingdom (the "**UK**") that may be transferred to Canada, You acknowledge that the European Commission, pursuant to decision 2002/2/EC has declared the Canadian *Personal Data Protection and Electronic Documents Act*, that applies to Us, provides an adequate level of protection for Personal Data transferred from the European Community.

Whenever Personal Data that originates from the EEA is processed by Resolver or one of its affiliates in a country that the European Commission has determined does not offer an adequate level of data protection, We transfer such data to that country with approved legal adequacy mechanisms in place, including EU Standard Contractual Clauses, as appropriate. We regularly monitor latest developments about appropriate data transfer mechanisms of EEA data to countries that do not have adequacy status.

7. Maintenance and Security of Personal Data

We retain Personal Data about Users as long as We believe it is necessary to fulfill the purpose for which it was collected. Currently, We hold Personal Data in North America, Europe and Oceania. Personal Data maintained on Our systems is protected using industry standard security measures. However, We cannot guarantee that the information submitted to, maintained on, or transmitted from Our systems will be completely secure and transmission of information over the Internet is susceptible to possible loss, misrouting, interception and misuse.

8. Access to Personal Data

You may update Personal Data either by accessing Our Software or by contacting Us. If You would like for Us to return, remove or make any additional corrections to any Personal Data or exercise any other data subject right available to you under the EU GDPR or the California Consumer Privacy Act of 2018 (CCPA), you can click here to complete the Data Subject Access Request form directly and We will consider Your request under applicable law. Requests to access, correct, or remove Personal Data, to the extent possible, will be handled within thirty (30) days and may be subject to a fee, as permitted by applicable law. To protect Your privacy and security, We may take steps to verify Your identity before complying with the request.

You also have the right to complain to a data protection authority about Our processing of Personal Data. For more information, please contact Your local data protection authority.

Please note that due to technical constraints and the fact that We back up Our systems, Personal Data may continue to reside in Our systems for up to sixty (60) days after deletion. Individuals, therefore, should not expect that their Personal Data would be completely removed from Our systems in response to an accepted request for deletion.

We reserve the right to decline access to Personal Data where the information requested:

a. Would disclose the Personal Data of another data subject or of a deceased data subject;

b. Would disclose business confidential information that may harm Us or the competitive position of a third party;

c. Is subject to solicitor-client or litigation privilege;

d. Could reasonably result in:

    i. serious harm to the treatment or recovery of the data subject concerned;

    ii. serious emotional harm to the data subject or another data subject; or

    iii. serious bodily harm to another data subject;

e. May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by statute to perform such functions;

f. Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the information; or

g. Does not exist, is not held, or cannot be found by Us.

Where information will not or cannot be disclosed, the data subject making the request will be provided with the reasons for non-disclosure. Where information will be disclosed, We will endeavour to provide the information in question within a reasonable time and no later than thirty (30) days following the request.

We will not respond to repetitious or vexatious requests for access. In determining whether a request is repetitious or vexatious, We will consider such factors as the frequency with which information is updated, the purpose for which the information is used, and the nature of the information.

To guard against fraudulent requests for access, We will require sufficient information to allow confirmation of the identity of the person making the request before granting access or making corrections.

9. Amendment of Resolver practices and this Statement

This statement is in effect and was last revised as of **December 23, 2022**. We will from time to time review and revise Our privacy practices and this Statement. In the event of any amendment, an appropriate notice will be posted on this site. Statement changes will apply to the information collected from the date of posting of the revised Statement to this site as well as to existing information held by Us.

10. Contact information

If You have any questions about the privacy practices of Resolver, or You wish to access Your Personal Data, please contact:

Outside of the EEA:

Privacy Officer
Resolver Inc.
804-111 Peter Street
Toronto, ON M5V 2H1
Canada
Email: resolver.privacy@kroll.com

Inside the EEA:

GDPR Representative
Resolver Inc.
c/o Kroll Advisory (Ireland) Limited
24 St. Stephen's Green
Dublin, Ireland D02 EK82
Email: kroll.privacy@kroll.com