

Privacy Policy

Last Updated: April 2022

Real World Associates Ltd (RWA) is committed to protecting the privacy of individuals who visit our public and private websites, including but not limited to: <u>salesleaderprogramme.co.uk</u> and <u>real-world-associates.com</u> as well as individuals who register to use our **Services** (as defined below) or who register to attend our events.

This Privacy Policy describes how and why RWA collects, uses and shares the personal information we receive or that you make available to us by using our Sites, applications, services, or events and programmes offered by RWA (collectively, the "Services"). It also describes the choices available to you regarding RWA's use of your personal information, the steps you can take to access this information and, where applicable, to request that we correct or delete it. We can be contacted by using the details in the **How to contact us** section below.

Personal information we collect

RWA collects personal information in a variety of ways described in this Privacy Policy. The types of personal information that we collect will depend on how you interact with us, as well as your location and applicable law. In addition to any other privacy notices you might receive, RWA collects the following types of information:

Site users

During your visit to one of our Sites, RWA collects personal information such as:

Location data: physical location (city, state, country) which you may provide to us or which can be inferred by an IP address.

Internet and electronic network activity information we collect automatically: browsing history, search history, your operating system, date and time information, online identifiers (e.g. IP address or other similar identifiers) and other technical information about your device (e.g. cookie and pixel tag information).

This personal information is collected to help you navigate our Sites with greater ease and it allows us to identify which types of content you are most interested in.

If you would like more information from RWA or if you register on one of our Sites, RWA collects the following personal information directly from you on a voluntary basis via forms in order to respond to your request:

Contact details: first and last name, email address, postal address, phone number. **Business information:** company name, industry sector, website address, professional role, number of employees, annual revenue.

How we use personal information

RWA uses personal information to operate, manage and improve our Services and Sites. We may rely on various legal means or legal bases for collecting and processing personal information, including: your consent (where necessary), a legitimate interest, necessity to enter into and perform contracts, and to comply with our legal obligations.

The legal basis RWA is required to use in order to collect and use your personal information will depend on your interaction with us and applicable law. RWA may use the personal information we collect for one or more of the following business purposes:

Fulfil your requests

When you make requests of RWA, we will use the information you provided to fulfil these requests. For example, if you share contact and business information to request more details about our Services, we will use that personal information to respond to your inquiry.

Provide Services

If you are a RWA Client, your personal information (e.g. contact details, business information, account credentials and financial information) is used to administer your account. The legal basis for administrating your RWA account and providing related Services is necessity to perform our contractual obligations.

Operate, maintain and improve our Sites

When you visit our Sites, RWA collects the personal information you provide directly as well as indirectly via cookies and similar technologies. The personal information collected indirectly may include location data as well as internet and electronic network activity. RWA will record your use of our Sites to operate and improve our Sites, thus helping us to better understand your needs and interests. We use certain analytic/tracking cookies service providers to improve and personalise your experience (e.g. BlueConic and Google Analytics). RWA has a legitimate interest in attracting new clients and understanding how our Sites are being used. We will seek your advance permission to use cookies or similar technologies, where legally required.

Communicate with you

Depending on the circumstances, your personal information may also be used to send additional information about RWA's Services, updates, promotions and events ("Communications") unless you opt out from receiving such Communications. We will seek your advance permission to send Communications if legally required. RWA sends Communications in accordance with applicable law and in furtherance of our legitimate business interest to maintain relationships, obtain referrals and to promote our range of Services and events.

General business and legal obligations

RWA also collects personal information described above to comply with our legal obligations, resolve disputes, enforce our agreements.

RWA undertakes technical and organisation measures to ensure the security of your data. Once we have received your personal data, we will use appropriate procedures to try to prevent unauthorised processing. However, we cannot warrant that the information which you provide to us will not be used by those who access and use your data in violation of this Privacy Policy or our Terms of Use. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or operational safeguards. RWA uses data for security, fraud prevention and investigations against any party who violates this Privacy Policy or Terms of Use.

How we share personal information

RWA may share your personal information with authorised service providers for RWA business purposes: Analytic/tracking cookies service providers (e.g. BlueConic, Google Analytics) to assist us with technical support, measuring the effectiveness of advertisements and understanding who is visiting our Sites and which parts of our Sites are most visited. These service providers will be obliged to abide by appropriate contractual terms and are not permitted to use your personal information for any purpose unrelated to providing services to RWA.

We may also share personal information if required by law; in the exercise of our legal rights; or take action regarding actual or suspected illegal or malicious activities; or to address actual or suspected violations of RWA's Terms of Use, and Confidentiality Pledge and Standards. RWA will not otherwise share your personal information with other individuals or companies, except when you have otherwise authorised this information to be shared. RWA does not sell personal information about you.

How long we keep personal information

RWA retains your personal information for the duration of the time that is consistent with the original purpose of collection. For example, we may retain your personal information while your account to use our Sites or Services is active. We may also retain personal information for a period of time thereafter to allow for the recovery of accounts if requested by you, analyse the data for RWA's business operations, and/or address our ongoing legal rights/obligations, resolve disputes, and enforce our agreements.

How to access and control your personal information

Access to your personal information

You have the right to request disclosure of certain information to you about our collection and use of your personal information. Any limits or exceptions under applicable law will be explained in our response to your verified request.

Deletion request rights

You have the right to request deletion of your personal information that RWA collected and retained. Upon receipt of your verifiable request, we may delete (and direct our service providers to delete) your personal information from our records to the extent required by law. There are certain exceptions where applicable law either allows or requires us to deny your deletion request. Such a denial will be explained in our response to your verifiable request.

No discriminatory treatment

When you choose to exercise your privacy rights, you will not receive any discriminatory treatment from RWA. This is not only a legal requirement, but it is in line with RWA's operational principal of "respect for the individual."

Residents of the European Union, United Kingdom and Switzerland

The European Union's General Data Protection Regulation (EU GDPR), the United Kingdom's Data Protection Act 2018 (UK GDPR), and the Swiss Federal Data Protection Act of June 19, 1992 (FADP), which will be replaced by the Revised Federal Data Protection Act (Revised FADP) when it becomes effective, provide certain rights.

You have the following rights, including the right to: access your personal information; correct, delete, restrict, or object to the processing of your personal information; as well as the right to data

portability of your data under certain conditions. You may also request information about: the processing purposes, the category of personal data, the categories of recipients to whom your data has been disclosed, the source if not collected directly from us, or the planned storage period. In addition, you can withdraw consent you may have given to RWA at any time. If you have any unresolved concerns that we have not addressed satisfactorily related to how we are processing your personal information, you have the right to contact the European or United Kingdom Data Protection Authorities or the Swiss Federal Data Protection and Information Commissioner (FDPIC).

How to exercise your rights

To exercise the rights described above, please submit a verifiable request to us by contacting us using the information in the How to contact us section below. Only you, or a person that you authorise to act on your behalf, may make a request related to your personal information. RWA must be able to verify such requests through the exercise of reasonable diligence. To be verifiable your request must:

Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorised representative; and

Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. We will use personal information provided in a request solely for the purpose of verifying the requestor's identity or authority to make the request.

Communication preferences

You may opt out of Communications by emailing us at: info@real-world-associates.com.

RWA may retain some of your personal information solely for the purposes of knowing your wish to not be contacted again in the future, or for other purposes that are legally permitted or required.

Links to other websites

Our Sites contain links to other third party websites; however, we are not responsible for the privacy practices or the content of such websites and do not make any representation as to the existence, sufficiency, accuracy or completeness of such websites or the privacy policies of such websites. Please see the website's privacy policy for more information on the website owner's data protection practices.

Changes to this Privacy Policy

RWA may update this Privacy Policy at any time, for any reason, without notice to you other than posting the amended Privacy Policy to this Site. RWA endeavours to ensure that this Privacy Policy is fully compliant with all applicable laws, however, the laws throughout the world are constantly evolving and changing. To the extent any part of this Privacy Policy is not compliant with applicable law, the non-compliant part shall be deemed automatically amended to the extent necessary to permit this Privacy Policy to be compliant.

How to contact us

If you have any questions or complaints regarding this Privacy Policy, please contact RWA's Privacy Team by email at: <u>info@real-world-associates.com</u>.