Scale Holdings Ltd (the "Company") t/a scalr 124 City Rd, London EC1V 2NX

#### <u>Introduction</u>

The Company ("we," "us," and "our") is committed to ensuring that it complies with all applicable legislation, including legislation respecting privacy and the use of personal information it collects in the course of its business. In this Privacy Policy, the term "Service" means any service or services, software, website, or sites used as further described in the Company's Terms of Use (the "Terms"). The Terms are the terms and conditions which apply to and govern a person, firm, or corporation (a "Customer") who/which buys from the Company, participates in, or uses any Service or Services, software, other product, website, or sites (individually an "Offering" and collectively the "Offerings") offered or supplied from time to time by the Company and/or uses any Service or Services.

## **Information We Collect:**

We only collect and use your personal information for purposes directly associated with our business activities, or as permitted by law. For example,

We only collect personal information from individuals when they volunteer their information in the following types of situations: when you subscribe to updates or newsletters; request a demo; purchase or use the Services; register for workshops, events, and/or webinars; participate in a promotion; use an Offering; use the scalr product; send us a comment about our business; respond to a question or concern which we have; or download promotional material on www.wearescalr.com/ (the "Website").

We collect several types of information from and about users of our Website, including information:

by which you may be personally identified, such as, but not limited to, name, IP address, and e-mail address ("Personal Information");

that is about you but individually does not identify you, such as generalised demographic information about (for example age range, gender, etc.), and general location; and/or

about your internet connection, the equipment you use to access our Website and usage details. We collect this information:

Directly from you when you provide it to us;

Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies; and

From third parties, for example: Google.

scalr will collect your Data in accordance with this privacy policy and GDPR.

### **Data Collection Practices**

Provided Information: When you engage with our platform, whether by completing online forms or using our services, we collect data. This may include, but is not limited to, data shared during registration, service subscription, product purchases, or service requests. Additionally, we may request information when you participate in our promotions or when seeking assistance with any issues related to our website.

Communication Logs: Should you reach out to us, we will maintain records of the communication, which may include your email address as part of our correspondence archive.

Usage Insights: We analyse various metrics related to your email interactions, such as scoring, mood assessment, and frequency of use, which help us tailor our core services to better suit your needs. It's important to note that our policy is to not store any of your correspondence with external parties during your usage of our software.

Survey Participation: We value the feedback you provide through surveys and may collect data based on your voluntary participation.

Transaction Records: We document the details of your transactions conducted via our website, which may encompass completing order fulfilments. For transactions, we may need to collect financial details to process orders.

Website Interactions: Your interactions with our website, reflected in your search queries and site navigation, are noted. While providing this information is at your discretion, it is essential for the delivery of certain services you may seek from our platform.

Please be aware that withholding certain information may impact the availability and quality of the services you request from us.

# **Data Retention**

Our commitment to data minimisation and relevance is unwavering. User data that has no relevance to scalr is not stored with scalr. Data that is stored includes key metrics such as, but not limited to, activities, attendance, transactions, that are tracked through our integrated service. Thus ensuring we only retain information that is essential for the provision of our services or as required by law. Users can request the deletion of their personal information by reaching out to hello@wearescalr.com, underscoring our adherence to privacy rights and data protection principles.

## **User Requests and Privacy Concerns**

Users can report privacy concerns or violations by emailing hello@wearescalr.com. We will investigate and address any reported concerns in a timely manner.

#### **Data Breach Procedures**

In the event of a personal data breach concerning personal data processed by us, we shall take appropriate measures to address the breach, including measures to mitigate its adverse effects. We shall also notify affected users without undue delay after becoming aware of the breach. Such notification shall contain the details of a contact point where more information can be obtained, a description of the nature of the breach (including, where possible, categories and approximate number of data subjects and personal data records concerned), its likely consequences, and the measures taken or proposed to address the breach, including, where appropriate, measures to mitigate its possible adverse effects. Where, and in so far as, it is not possible to provide all information at the same time, the initial notification shall contain the information then available, and further information shall, as it becomes available, subsequently be provided without undue delay.

### **Data Storage and Third-Party Integrations**

We prioritise the security and confidentiality of your personal information. User data, including email interactions, is managed with utmost care and is stored on secure servers. Specifically, user data is accessed via API via scalr services on AWS servers which are configured to not accept direct external connections, ensuring user data safety. This architecture guarantees that user data is not shared with any 3rd party, but only with the user and the parties the user has authorised to share the data with.

## **Changes to Our Privacy Policy**

We reserve the right to amend this privacy policy at our discretion and at any time. When we make material changes to this privacy policy, we will provide notification by email or through a notice on our website homepage.

## **Your Rights and Choices**

You have the right to access, correct, update, or delete your personal information. You can do so by reviewing your profile in the scalr platform. If you would like us to remove your personal information from our records, to the extent permitted by law, you can inform us by email to hello@wearescalr.com.

# **Opt-Out of Communications**

If you would like to not receive further communications from us, you may contact us at any time by email (see address above), and in the "subject line" type "Unsubscribe." Some communications you receive from us may contain an "Unsubscribe" link. If you wish to inform us that you no longer wish to receive those communications, you can do so by using that link to communicate your wishes.

## **Cookies and Tracking Technologies**

Note that when you use the Service (whether by way of a purchase or otherwise), a cookie (a very small text file) may be placed on your computer (if it is accepted), and we collect certain information about your computer hardware and software to provide us with general statistics regarding the use of the Service, including without limiting the generality of the foregoing, the collection of the Service visitation statistics; your IP address; browser type; operating system; and access times. This information is used for managing our business operations, to identify unauthorised attempts to upload or change information that could otherwise cause damage to us, to our Services, or to other products or other persons, firms, or corporations, and to evaluate and improve the effectiveness of our communications, Services, and Offerings.

## **Contact Us**

If you have any questions, concerns, or requests regarding this Privacy Policy, ways in which we collect and use a consumer's personal information, how to receive a copy of the Privacy Policy and/or this Statement in an alternative format (for consumers with a disability), a consumer's choices and rights regarding such use, or to exercise consumer rights under California or other state law, please do not hesitate to contact us at:

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Email: hello@wearescalr.com