



## Privacy Policy

<b>Document Control Information</b>			
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*The current version of this document is up to date. Any future versions or changes to this document must also be approved by the author and the Executive Team and issued on a version-controlled basis under their signature. This document has been stored at Safe Storage.*

## Privacy Statement Summary:

This Privacy Policy (“**Policy**”) explains how your information is collected, used and disclosed by Lieberman, Inc. & FRC A Lieberman Company, Inc. & Responsys Mobile, Inc (“**we**” / “**us**” / “**our**”). This Policy applies where we are acting as a Data Controller, where we determine the purposes and means of the processing of that personal data, for example with respect to the personal data of our website visitors, service users, clients, partners etc.

<b>Who will use my data?</b>	Lieberman, Inc. & FRC A Lieberman Company, Inc. & Responsys Mobile, Inc
<b>What for?</b>	<p>We will store and process your data in order to allow us to provide our products and services. This includes contact details, company information, and in some cases company financial information.</p> <p>If you contact us, we may also send you information that we think you will be interested in. This may include a range of related products and services. We will also send any relevant details to authorities and any other organisation that requires them by law.</p>
<b>What will happen if I contact you?</b>	If you contact us, we will use your data to send you the information that you have requested and updates, and other information that we think you will be interested in. This may include a range of related products and services.
<b>What data will be stored?</b>	We will store your personal details in order to provide our services and run our company. This includes your contact details, company information, and in some cases company financial information.
<b>What data will be shared?</b>	<p>We will not share your data with any third parties other than as described here, to fulfil our obligations to you, operate and develop our company, and to protect our interests. We will only share any data that is particularly relevant to our process in order to provide the services that we offer. We may share your information with regulators or legal bodies that request it.</p> <p>We may also share your data with international organizations, for instance, Microsoft services such as Microsoft 365 or Azure, HR platforms such as [BambooHR], and security awareness tools such as KnowBe4, where this is the case, we will ensure your data is kept secure and appropriate controls, agreements, risk assessments have been completed.</p>
<b>How long?</b>	Your data will be stored for up to 7 years following the last contact we have with you, after which time your data will be deleted. For more information, please refer to our Data Retention Policy.

<b>Who can access my data?</b>	We will never sell, share or otherwise distribute your data to any other third party other than as described here. Access to your data is carefully controlled.
<b>How is my data kept secure?</b>	We will store your data on secure servers. We use industry-standard security protocols/technology to secure your data.

## About This Privacy Policy

This policy sets out how we will collect, store, and process the information you provide to us, the information we collect as a result of our interaction, the information we collect about you from other sources, or the information we service about you by using the information we hold.

This policy helps to protect us from data security risks, including breaches of confidentiality, failing to offer choice, reputational damage, and any other risks inherent in the collection, storage, or processing of your data.

With this policy, we will work towards meeting the following goals:

- Ensuring the protection of the individual’s privacy rights and personal information
- Promoting transparency and accountability in the processing of personal information
- Minimizing the risk of data breaches and unauthorized access to personal information
- Compliance with applicable laws, regulations, and guidelines
- Establishing a framework for effective management of personal information

## Principles of Processing Personal Information

The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process, and store personal information. These rules apply regardless of whether data is stored electronically, on paper or other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principles. These say that personal data must:

- Be processed fairly and lawfully;
- Be obtained only for specific, lawful purposes;
- Be adequate, relevant, and not excessive;
- Be accurate and kept up to date;
- Not be held for any longer than is necessary;

- Processed in accordance with the rights of the data subjects;
- Be protected in appropriate ways;
- Not be transferred outside the UK, unless that country or territory also ensures an adequate level of protection.

We take these responsibilities seriously; this document describes our approach to data protection.

## **Who We Are And How To Contact Us**

Lieberman, Inc. & FRC A Lieberman Company, Inc. & Responsys Mobile, Inc is registered in the United States. The Data Protection Lead is Mitchel Horowitz. You can contact us in any of the following ways:

- Name of Data Protection Lead: Mitchel Horowitz
- Company name: Lieberman, Inc. & FRC A Lieberman Company, Inc. & Responsys Mobile, Inc
- Data Protection Lead Address: 98 Cutter Mill Road, Suite 359 Great Neck, NY 11021
- Data Protection Lead Number: (516) 829-8880

## OUR ARTICLE 27 REPRESENTATIVE

We have appointed EU and UK Representatives under Article 27 of the EU GDPR and UK GDPR respectively. Our appointed representatives are:

### Our UK Representative:

Under Article 27 of the UK Data Privacy Act, we have appointed a UK Representative to act as our data protection agent. Our nominated UK Representative is: GDPR Local Ltd.

Adam Brogden [contact@gdprlocal.com](mailto:contact@gdprlocal.com)

Tel +44 1772 217800

1st Floor Front Suite

27-29 North Street, Brighton

England

BN1 1EB

If you believe your data has not been handled in accordance with applicable UK GDPR laws, you can report your concern confidentially through our GDPR Reporting Portal:

- <https://liebermaninc.gdprlocal.com/uk>

### Our EU Representative:

Under Article 27 of the GDPR, we have appointed an EU Representative to act as our data protection agent. Our nominated EU Representative is: Instant EU GDPR Representative Ltd.

Adam Brogden [contact@gdprlocal.com](mailto:contact@gdprlocal.com)

Tel +35315549700

INSTANT EU GDPR REPRESENTATIVE LTD

Office 2,

12A Lower Main Street, Lucan Co. Dublin

K78 X5P8

Ireland

If you believe your data has not been handled in accordance with applicable EU GDPR laws, you can report your concern confidentially through our GDPR Reporting Portal:

- <https://liebermaninc.gdprlocal.com/eu>

## **To whom does this privacy policy apply?**

We process your data to offer you our products and services and to run our company. This applies to all data we hold relating to identifiable individuals, even if that information technically falls outside of the GDPR. This policy relates to the following identified categories of data subjects:

- employees
- clients
- customers
- suppliers
- partners
- add other categories of data subjects if applicable

## **What this policy applies to?**

This section describes the purposes for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- The information you provide when you contact us
- When you contact us to discuss using our services
- Information we collect about how you use the website
- Information relating to services we offer to you and other transactions including financial and other personal information required to complete these transactions
- Information that is given and stored as part of our ongoing relationship
- Information we collect as a result of our interaction,
- The information we collect about you from other sources,
- or information we service about you by using the information we hold.

We do not routinely collect or process sensitive data about you. However, where this is the case we will ensure we ask for your consent where applicable and take appropriate precautions to protect your data.

## How your information will be collected and used?

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	a. Identity b. Contact	a. Performance of a contract with you b. Consent
To process and deliver the products and services you request including digital signages, and to manage payments, fees and charges.	a. Identity b. Contact c. Financial d. Transaction e. Marketing and Communications	a. Performance of a contract with you b. Necessary for our legitimate interests to recover debts owed to us c. Consent
To manage our ongoing relationship with you which will include notifying you about changes to our terms, services or privacy policy, to maintain our records	a. Identity b. Contact c. Profile d. Marketing and Communications	a. Performance of a contract with you b. Necessary to comply with a legal obligation c. Necessary for our legitimate interests to keep our records updated and to study how customers use our services d. Consent
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a. Identity b. Contact c. Technical	a. Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise b. Necessary to comply with a legal obligation c. Consent
To use data analytics to improve our website, services, marketing, customer relationships and experiences	a. Technical b. Usage	a. Necessary for our legitimate interests to define types of customers for our services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy (for the necessary cookies) b. Consent (for the accepted cookies)
To make suggestions and	a. Identity	a. Necessary for our legitimate

recommendations to you about services that may be of interest to you	b. Contact c. Technical d. Usage e. Profile	interests to develop our services and grow our business b. Consent
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We may collect and process information about you, including your name, address, address, contact details (including email address and mobile phone number. We may take personal information from a range of sources.

We will use your data for the purpose it was collected. Where we have your consent or another lawful basis, we may also use your personal information to send you marketing communications about services, promotions, and offers that may be of interest to you. This document explains how you can manage your communication preferences. Please note that, even if you opt out of marketing communications, we may still send you important service-related messages, including those necessary for the provision of any services we offer you. You will only receive marketing communications from us if:

- You requested information from us
- You provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications
- You have not opted out of receiving marketing
- We have an appropriate lawful basis for processing your personal data for this purpose

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **How to change your preferences**

We operate in line with the GDPR data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities. Where possible any requests or objections should be made in writing to the Data Controller, or you can visit our website, call, or email us to contact us to exercise your rights, make a complaint, or change your preferences at any time.

### **Opting out at a later date**

You have the right to amend or withdraw your consent at any time, including opting out of marketing communications or the processing of financial data. You can also object to the processing of your data and request its deletion. We respect all user rights as defined in the



GDPR. If you have any questions, comments, or wish to file a complaint, please contact us.

### **How we store and process your data**

Your data will be collected, stored and processed securely. In case where we transfer your data internationally, we will ensure we take appropriate precautions to protect this data. Your data will normally be stored for up to 7 years in order to meet our legal obligations and protect our interests.

We will only use your personal data for the purposes for which it was collected unless we reasonably believe that another use is necessary and compatible with the original purpose. If you would like more information about the compatibility of a new purpose with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis for doing so.

In certain circumstances, we may be legally required to disclose your personal information without your knowledge. These circumstances include legal obligations, ongoing or prospective legal proceedings, or to establish, exercise, or defend our legal rights. This may involve providing information to others for fraud prevention or credit risk reduction. We may also disclose information if we believe a court or other competent authority would likely order us to do so.

### **Our obligations**

As the Data Controller, we are legally responsible for the handling of the information you provide to us. We are committed to complying with the GDPR in all aspects of how we use and share your personal data.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data;
- Request correction of your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Request transfer of your personal data;
- Right to withdraw consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Third Parties**

We may have to share your personal data with selected third parties in order to meet our obligations to you and for the purposes described in this document:

- Service providers who provide IT and system administration services;
- Third parties including data processors, suppliers, service providers, equipment providers, and other third parties as required to run and grow our business;
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services;
- Other technology companies providing tracking, analytics, and advertising companies;
- Social media companies;
- Companies in our Group of companies FRC, A Lieberman Company, Responsys, RxOpinionsNow;
- Partners and other organisations involved in the provision of our services to you and as required to operate our company;
- Government organisation, regulators, other legal authorities and other relevant jurisdictions who require reporting of processing activities in certain circumstances;
- Third parties to whom we sell, transfer, or merge parts of our business or our assets;
- Other companies as required to meet our obligations to you and run our business.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## **Security**

We have implemented appropriate security measures to protect your personal data from accidental loss, unauthorized access, use, alteration, or disclosure. Access to your data is restricted to employees, agents, contractors, and third parties who have a legitimate business need to know. They are authorized to process your data only under our instructions and are bound by confidentiality obligations.

In compliance with GDPR requirements, we will report any data breaches or potential breaches to the relevant authorities within 24 hours of becoming aware of them, and to affected individuals within 72 hours. If you have any questions or concerns regarding your data usage, please contact us.

Our website may contain links to third-party websites, plug-ins, and applications. Interacting with these links or connections may enable third parties to collect or share your data. We have no control over these third-party websites and are not responsible for their privacy practices. We encourage you to review the privacy policy of each website you visit after leaving our site.

## **Cookies**

A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine.

## **Contacting us, exercising your information rights and Complaints**

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: Mitchel Horowitz Lieberman, Inc. & FRC A Lieberman Company, Inc. & Responsys Mobile, Inc. We aim to process data protection requests within 30 days, SAR responses are usually free, but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied, then you have the right to apply directly to your local data protection authority.

You can find the list at [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en)