

**convera**

# **Global Privacy Statement**

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# Introduction

Convera and its subsidiaries and affiliates (“**Convera**” or “**we**” or “**us**”) care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data protection laws to better serve you. For a list of local Convera entities, please see the “[Convera Legal Entities](#)” section.

## Scope of This Privacy Statement

This Privacy Statement describes how Convera collects, uses, stores, protects, discloses and shares your personal information or data when you use our Services online through our website, over the phone and through our mobile apps, as well as your choices about the way your information is collected and used. Personal information means all information or data relating to an identified or identifiable individual.

## Personal Information Convera Collects

When you use our services, contact us, access our websites or applications (collectively, the “**Services**”), we collect personal information about you and may use it along with other information collected or generated during our relationship with you. The personal information we collect depends on the context of the business relationship and your interaction with Convera.

We collect different types of personal information relating to you, which may include:

- Identifiers, such as account information and contact information, for example your name, postal address, email address, telephone number, date of birth and nationality;
- Payment transaction information, which includes information about payers, remitters and beneficiaries for whom a payment is submitted, bank account, routing number, amount and currency, other financial information;
- Professional or employment information, which includes business information, employer information, contact emails, taxpayer ID numbers;
- Business related information that helps us provide our Services to you, how you use our Services, your interactions and communications to us during the duration of the relationship (such as orders, support requests, recordings of or information from calls and other correspondence with our teams), bank and credit information, referrals and permissions to contact or marketing choices;
- Technical information, including the host from which you access the Internet, your IP address or device advertising ID, geolocation if enabled, information about your device (such as device properties, settings, applications, biometric data (e.g., when you consent in the user experience: Touch ID/Fingerprint, face biometric, liveness detection to verify your identity), storage and usage information), mobile application, browser and operating system software, social profile and network information, the date and time you access our websites and the address of the site from which you linked to our website when you visit us. We collect

personal information on your online activities as described in the section titled "[Internet Technologies](#)."

- Compliance information, including fraud prevention, identity verification, and sanction checks. Depending on what information you provide Convera with, Convera may collect and process copies of official identification documents and sensitive information in relation to the purpose of identity verification and screening your personal information against lists of politically exposed persons ("PEP") and lists of persons or entities subject to sanctions.

To provide foreign exchange and payment instructions, or use other foreign exchange or payment services, you must provide certain information required by Convera to execute the transaction and to enable us to comply with our legal obligations associated with our foreign exchange and money transfer services. Failure to provide some of your personal information may affect our ability to provide our Services to you. This may include information about the form of identification used to send or receive a transaction (where required by law) including the identification or a copy of the identification document, transaction activity, bank account and payment information.

## How Convera Collects Personal Information

Convera collects your personal information in several ways:

Personal information collected from you, including from your interactions with us and use of our Services:

- Through your account, transaction forms and your interactions with Convera affiliates and partners;
- Through online forms, registrations or competitions, and other online Services we offer (some of which may be managed by third parties on behalf of Convera);
- While providing customer support or consultation, including using email, postal mail, call centers or live chat; we may make recordings of telephone calls and video conferences with clients and prospective clients;
- Through the process of maintaining and upgrading our Services;
- Through automated means such as communications protocols, email communications and cookies or similar Internet Technologies;
- Through any mobile applications (some of which may be managed by third parties on behalf of Convera);
- Through your use of social media or other public data sources; and
- Through your interest in Convera advertisements placed on third party sites.

In addition to the personal information we collect from you, we may also collect personal information from other sources: your bank, as well as our vendors, business partners, identity verification companies, payments and fraud risk management companies, law enforcement bodies, and commercial and public data sources.

Personal information you give to us about others: by sharing other individuals' personal information for business purposes – such as data belonging to your staff members or other related individuals – you confirm that these individuals have been informed about the use of

their personal information by Convera in accordance with this privacy statement. You also confirm that you have obtained all necessary consent, as required by laws and regulations applicable to you.

## How Convera Secures Your Personal Information

We endeavour to use organisational, technical and administrative safeguards that comply with applicable government laws and regulations to secure your personal information. We also endeavour to restrict information access to our employees, partners and representatives that need to know it. Despite our efforts, and as you probably know, third parties may unlawfully intercept or access transmissions sent to us or may wrongly instruct you to disclose personal information to them while posing as Convera.

Please contact us immediately in accordance with the "[Contacting Us](#)" section, if you have reason to believe your personal information held by Convera may be at risk.

## Internet Technologies

We use internet technologies like cookies, tags and web beacons on our websites, in mobile applications or when you visit a third-party website for which Convera provides online Services for a variety of purposes, including, but not limited to those identified in the section titled "[How Convera Uses The Personal Information It Collects](#)".

Convera has implemented the capability for the user to manage cookies on our websites. We will only read or write cookies based on your preference level. For more information on how Convera uses cookies please refer to our website.

## How Convera Uses The Personal Information It Collects

Convera utilises the personal information it collects for the following commercial purposes:

- **Performing the Services:** To administer the business relationship, to assist us in providing Services to you and help you to receive a personalised experience and assist you in carrying out transactions, registering and accessing account information;
- **Verification:** To verify your identity and to check and refresh your information for accuracy, including verifying it with third-parties, to fulfil our legal obligations to conduct "Know Your Customer" and "Know Your Business" checks, including performing enhanced due diligence when applicable and screening your information against lists of politically exposed persons ("PEP"), sanctions and other lists;
- **Authentication:** To recognise you and allow you to remain signed-in during your visit without having to re-enter your password;
- **Customer Experience:** To provide support services – for example, to respond to requests, questions or concerns, and communicating with you for service-related purposes; we may notify you of updates to the services, scheduled maintenance, security alerts and we may also hold training sessions, webinars and events.

- **Analytics, Improvement and Research:** To perform analytics on understanding our customers, how they use our services and improving their experience; and to understand, track and improve how we market and sell our services, including service testing, quality assurance and analytics;
- **Web Traffic Analysis:** To determine whether you came to Convera from a banner ad or an Affiliate;
- **Advertising:** To deliver information specific to your interests on non-Convera websites and applications;
- **Analysis of Promotions:** To better understand the effectiveness of our promotional campaigns and whether you acted on our promotional messages;
- **Legal and Compliance:** To fulfil our legal obligations under applicable money-laundering regulations, to monitor the payments processed by us and to report suspicious transactions, to handle and resolve legal disputes or for regulatory investigations, risk management, and compliance; and
- **Security, Fraud Detection and Prevention:** To promote safety, reduce financial risk and combat fraud across our Services; and fulfil other purposes which would be reasonably expected by you, or which are otherwise authorized or required under law.

## Legal Bases Upon Which We Use Your Personal Information

Convera may use your personal information as explained elsewhere in this Privacy Statement for each of the following legal bases:

- *We use your personal information to provide our Services to you.* This includes using personal information necessary for processing foreign exchange and payment transactions or otherwise conducting foreign exchange and payment services offered to you. We may use this information in the performance of a contract with you or for taking steps to enter into a contract for any of the above or for any other Convera products or services.
- *We use your personal information for legitimate business purposes.* This includes using personal information to analyse and improve our products, locations, services, operations, the running of this site and your customer experience, and for measuring marketing return on investment and brand satisfaction. This may include using your information to conduct market research surveys. We may also use your personal information to provide customer services and to help protect the security and integrity of our technology, systems, and services.
- *We use your personal information for legal and compliance purposes:* This includes using personal information needed to comply with legal and regulatory duties related to anti-money laundering and counter-terrorist financing; detection, prevention and prosecution of fraud and theft as well as preventing illegitimate or prohibited use of our Services or other illegal or wrongful activity. This may also include establishing, exercising, or defending legal rights and claims of Convera and others, and monitoring and reporting compliance issues. This may further include using your personal information to validate and authenticate your identity and utilising third parties to help us do so.

- *We may process your personal information based on your consent as outlined in this Privacy Statement.* This includes consent for receiving marketing communications, or where otherwise required by applicable law. If we request your consent, we will inform you of the intended purposes for which your information will be processed.

We will inform you when additional information is required to provide the Services you request or is required by law.

## How Convera Markets to Its Customers

Convera will also, subject to your preferences, notify you of offers, promotions and updates regarding our products and Services. These may include offers by email, telephone, postal mail, social media and other communication or digital channels.

You can opt out of receiving marketing communications at any time. If you no longer want to receive marketing-related communications from us on a going-forward basis, you may opt out by following the instructions in the relevant electronic communication or by contacting us as described in the "[Contacting Us](#)" section.

Please note that if you opt out of receiving marketing-related communications from us, we may still send you important service, administrative or transaction-related communications.

## Information from Children

Convera does not provide our Services or products to children under the age of 18. Convera does not knowingly collect or maintain information from persons under the age of 18 other than for purposes of legal or compliance.

## External Websites

Convera's Website may be linked to or from third party websites. Convera has not reviewed, does not control, and is not responsible for the content or privacy practices employed by websites that are linked to or from our website. Convera does not assume responsibility for any of these sites, their content, or their privacy policies. Convera does not endorse third party websites or make any warranties about any information, software or other products or materials you may find there, or any results that may be obtained from using them.

For further information about liability towards external websites, please review our website Terms of Use.

## Who Convera Shares Your Data With

For any of the purposes listed in this Privacy Statement, Convera may disclose applicable personal information including, but not limited to, your name, contact information, national identification number, customer ID number, address, transaction patterns and bank account information to the following types of organisations or parties:

- Convera group companies and affiliates, including those listed in the section titled "[Convera Legal Entities](#)";

- Local licensed entities who are supporting, partnered with or receiving services from Convera;
- Our business partners who facilitate our payment transactions or specific Services you have requested;
- Vendors, payments processors, banking partners and data processors contracted to provide business and customer services;
- Customer services, based on your consent where applicable, including marketing, advertising and customer satisfaction and market research on our behalf;
- Vendors and data processors contracted to help us validate the accuracy of the information provided by you, and to authenticate your identity and manage risks related to security, fraud and identity;
- Third parties that you have authorised to access your account and/or your account information in order to perform Services for you, such as account information service providers and payment initiation service providers.

We may transmit personal information we possess in connection with a sale or transfer of all or part of our business. We may also disclose your personal information globally, as required or permitted by applicable laws and regulations, to regulatory and financial authorities, credit reporting agencies, law enforcement bodies, courts, governments or government agencies, to meet compliance and legal obligations or to assert or defend the rights and interests of Convera or others.

## **International Data Transfers**

We transfer your information to parties in countries outside the country, region or province it was collected, including but not limited to the United States, as permitted or required by applicable law, regulatory authorities, law enforcement and government agencies. If you are a Quebec resident, this means your personal information may be transferred outside Quebec, including to service providers located outside Quebec. Additionally, when you send or receive money to or from another country, we will also be required to share some of your personal information with that country as required or permitted by law.

We transfer and store information in the United States or within a region as required by local law and process it to fulfil our legal and compliance obligations which apply to our Services. To facilitate our global operations, information may be accessed by employees from other countries in which Convera operates. We also store certain personal information we collect based on your marketing choices in a data center located in United States. By using Convera's Services, you acknowledge that such transfers of information outside of your country or province of residence may occur.

## **Transfers from the EEA and UK**

Personal information transferred outside the EEA to countries that the European Commission has not found to provide adequate protection will be subject to appropriate transfer mechanisms such as the EU Standard Contractual Clauses ("EU SCC's") or other transfer mechanism or derogation as required or permitted by law .



Personal information transferred outside the United Kingdom to countries not covered by the adequacy regulation will be subject to appropriate transfer mechanisms such as the International Data Transfer Addendum to the European Commission's Standard Contractual Clauses for international data transfers (UK Addendum), or the International Data Transfer Agreement (UK IDTA), or other transfer mechanism or derogation as required or permitted by law.

You may obtain a copy of these measures by contacting us as indicated below or by following this link for obtaining the EU SCC's: [Standard contractual clauses for international transfers \(europa.eu\)](https://european-courts.europa.eu/document-portal/10000/13672/13672_en.pdf)

## **Profiling and Automated Decision Making**

We may use profiling and automated decision making for the purpose of conducting Business Verification and Know Your Customer checks, including identity verification and due diligence processes when applicable, screening against PEP-lists, sanctions lists and other lists to identify and mitigate risks associated with things such as money laundering and financing of terrorism.

## **Retention of Personal Information**

Your personal information will be retained in accordance with statutory periods contained in regulations applicable to financial transactions including those in anti-money laundering, anti-terrorist financing and other laws applicable to us. Otherwise, we will retain your information if necessary for the specific purposes it was collected, or to resolve any query you may raise. We will typically keep your information for no longer than the purpose(s) for which it was obtained, unless we have a legal or regulatory obligation to keep it for a longer period or retention is advisable for Convera's legal position (for example, regarding applicable statutes of limitations, litigation or regulatory investigations).

## **Accessing, Deleting or Correcting Your Personal Information**

You have the right to know if we are processing your personal information and, subject to applicable law and certain limitations and exemptions, to ask us for a copy of your information free of charge. You have the right to request a structured and machine-readable copy of certain information you have provided to us. We may charge you a reasonable fee for providing the information, or not act upon your request, if the request is manifestly unfounded or excessive. You have the right to stop us from sending you marketing communications. You have the right to ask us to correct information about you that is incomplete, inaccurate or out-of-date. You have the right to ask us to delete certain information about you, to restrict certain uses of information relating to you, and to object to certain uses of it. You have the right to object to an automated decision, if the automated decision produces legal effects or similarly significantly affects you. To the extent we are processing personal information based on your consent, you may withdraw your consent as permitted by applicable law.

You also have the right to lodge a complaint with a relevant data protection regulator or supervisory authority about our processing of personal information. When we receive a request, we may ask for additional information from you to verify your identity. In some situations, we

may refuse to act or may impose limitations on your rights, as permitted by applicable law. To exercise these rights, please visit our website, submit a request via the [Privacy Webform](#) or contact Convera through the section titled "[Contacting Us](#)".

We endeavour to respond to your request within 30 days but response time may vary depending on the laws and regulations applicable to your request and we may be entitled to extend this period in certain circumstances. We will comply with your request to the extent required by applicable law.

## **Contacting Us**

Convera has appointed a Data Privacy Officer who is responsible for advising on and monitoring compliance with applicable data protection legislation and has a dedicated privacy office that can assist you in case of questions.

If you have a question or complaint about how we handle your personal information, or want to exercise any of the rights explained above, you are welcome to contact us. Please do so in writing at [privacymatters@convera.com](mailto:privacymatters@convera.com) or submit a request by completing this online form: [Privacy Webform](#). We will investigate your enquiry and generally respond to you in writing within 30 days of receipt. If you want to reach the Data Privacy Officer specifically, please state this in your request or email.

To contact us via registered letter, please refer to the contact information in the [Convera Legal Entities](#) section, c/o Privacy Office. To contact us via a toll-free or local phone number, please refer to the contact section of our website.

## **Changes to This Statement**

Convera reserves the right to modify this Privacy Statement. Updated privacy statements will be posted on our website when amendments occur and may include information on additional processing activities we intend to perform going forward. We therefore urge you to review this Privacy Statement when using our Services to obtain the most current statement.

# USA Customers (Including California Residents) Privacy Notice

## California Addendum to the Convera Privacy Statement

We care about the privacy of our Californian users and are committed to collecting, using, storing, protecting, disclosing and sharing your personal information in accordance with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (“CCPA”). This California Addendum to the Convera Privacy Statement (“**Addendum**”) is applicable to residents of California and, in conjunction with the Privacy Statement, is intended to address the requirements of the CCPA.

When you use our Services, we collect personal information about you as permitted by applicable laws and regulations. The Categories of Personal Information described below are subject to the CCPA. However, note that the CCPA does not apply to personal information we collect that is protected under other laws, such as the Gramm-Leach-Bliley Act (GLBA), or the Health Insurance Portability and Accountability Act (HIPAA). Depending on how you interact with us or our Services, we may provide supplemental privacy notices explaining our handling of your personal information subject to these other laws.

For more information about the personal information that may have been collected about you, please review our [Privacy Statement](#).

### Collection of Personal Information

Convera may collect (and in the 12 months prior to the effective date of the Privacy Statement, Convera may have collected) the below Categories of Personal Information from the indicated Categories of Sources; this information may have been shared with the described Categories of Third Parties for the specified Business Purposes. Categories of Sources, Categories of Third Parties, Commercial Purposes and Business Purposes are further defined in the Privacy Statement and below.

Categories of Personal Information	Categories of Sources	Business and Commercial Purposes	Categories of Third-Party Recipients
<p><b>Identifiers:</b> contact information provided for example your name, postal address, email address and telephone number; date of birth provided; nationality provided, social profile and network information; IP address; device identifier; mobile ad identifier; cookies; beacons; and pixel tags</p>	<ul style="list-style-type: none"> <li>You,</li> <li>Your Use of our Website</li> <li>Your Use of Mobile Applications,</li> <li>Affiliates, Subsidiaries or Vendors,</li> <li>Third parties</li> </ul>	<ul style="list-style-type: none"> <li>Auditing,</li> <li>Security Purposes,</li> <li>Performing the Services,</li> <li>Quality Purposes,</li> <li>Authentication,</li> <li>Analytics,</li> <li>Web Traffic Analysis,</li> <li>Advertising,</li> <li>Analysis of Promotions,</li> <li>Safety</li> </ul>	<ul style="list-style-type: none"> <li>Our affiliates and subsidiaries,</li> <li>Service providers,</li> <li>Our business partners,</li> <li>Professional services organisations,</li> <li>Data analytics providers,</li> <li>Operating systems and platforms,</li> <li>Advertising and social networks,</li> <li>Government entities.</li> </ul>

<p><b>Commercial information:</b> including use of our Services, communications with us, payment and transaction information, bank account, routing number, amount and currency, other financial information</p>	<ul style="list-style-type: none"> <li>You,</li> <li>Your Use of Our Website,</li> <li>Affiliates, Subsidiaries or Vendors,</li> <li>Third parties</li> </ul>	<ul style="list-style-type: none"> <li>Performing the Services,</li> <li>Auditing,</li> <li>Security Purposes,</li> <li>Internal R&amp;D,</li> <li>Short-term use,</li> <li>Quality Purposes,</li> <li>Safety</li> </ul>	<ul style="list-style-type: none"> <li>Our affiliates and subsidiaries,</li> <li>Service providers,</li> <li>Our business partners,</li> <li>Professional services organisations,</li> <li>Data analytics providers,</li> <li>Operating systems and platforms,</li> <li>Government entities.</li> </ul>
<p><b>Internet and Other Electronic Network Activity Information:</b> including the host from which you access the Internet, information about your device (such as device properties, settings, applications, storage and usage information), mobile application, browser and operating system software, the date and time you access our websites and the address of the site from which you linked to our website when you visit us.</p>	<ul style="list-style-type: none"> <li>Your Use of Our Website,</li> <li>Your Use of Mobile Applications,</li> <li>Affiliates, Subsidiaries or Vendors,</li> <li>Social Media Networks or Publicly Available Sources,</li> <li>Advertising Networks</li> </ul>	<ul style="list-style-type: none"> <li>Auditing,</li> <li>Security Purposes,</li> <li>Debugging,</li> <li>Short Term Use,</li> <li>Performing the Services,</li> <li>Internal R&amp;D,</li> <li>Quality Purposes,</li> <li>Authentication,</li> <li>Analytics,</li> <li>Web Traffic Analysis,</li> <li>Advertising,</li> <li>Analysis of Promotions,</li> <li>Safety</li> </ul>	<ul style="list-style-type: none"> <li>Our affiliates and subsidiaries,</li> <li>Service providers,</li> <li>Our business partners,</li> <li>Professional services organisations,</li> <li>Data analytics providers,</li> <li>Operating systems and platforms,</li> <li>Advertising and social networks,</li> <li>Government entities.</li> </ul>
<p><b>Geolocation Data:</b> precise geo-location may be collected from your devices only if enabled</p>	<ul style="list-style-type: none"> <li>Your Use of our Website,</li> <li>Your Use of Mobile Applications</li> </ul>	<ul style="list-style-type: none"> <li>Auditing,</li> <li>Security Purposes,</li> <li>Short-term use,</li> <li>Internal R&amp;D,</li> <li>Quality Purposes,</li> <li>Safety</li> </ul>	<ul style="list-style-type: none"> <li>Our affiliates and subsidiaries,</li> <li>Service providers,</li> <li>Data analytics providers,</li> <li>Operating systems and platforms,</li> <li>Advertising and social networks,</li> <li>Government entities.</li> </ul>
<p><b>Audio, Electronic, Visual, or Similar Information:</b> including call recordings if you interact with our customer service representatives.</p>	<ul style="list-style-type: none"> <li>You</li> </ul>	<ul style="list-style-type: none"> <li>Performing the Services,</li> <li>Auditing,</li> <li>Security Purposes,</li> <li>Short-term use,</li> <li>Quality Purposes,</li> <li>Safety</li> </ul>	<ul style="list-style-type: none"> <li>Our affiliates and subsidiaries,</li> <li>Service providers,</li> <li>Data analytics providers,</li> <li>Operating systems and platforms,</li> <li>Government entities.</li> </ul>

<p><b>Professional or employment information:</b> including business information, employer information, contact emails, taxpayer ID numbers</p>	<ul style="list-style-type: none"> <li>You,</li> <li>Your Use of Our Website,</li> <li>Affiliates, Subsidiaries or Vendors,</li> <li>Third parties</li> </ul>	<ul style="list-style-type: none"> <li>Performing the Services,</li> <li>Auditing,</li> <li>Security Purposes,</li> <li>Internal R&amp;D,</li> <li>Short-term use,</li> <li>Quality Purposes,</li> <li>Safety</li> </ul>	<ul style="list-style-type: none"> <li>Our affiliates and subsidiaries,</li> <li>Service providers,</li> <li>Our business partners,</li> <li>Professional services organisations,</li> <li>Government entities.</li> </ul>
<p><b>Inferences</b> drawn from any of the information identified above</p>	<ul style="list-style-type: none"> <li>You,</li> <li>Your Use of Our Website,</li> <li>Your Use of Mobile Applications,</li> <li>Affiliates, Subsidiaries or Vendors,</li> <li>Social Media Networks or Publicly Available Sources</li> </ul>	<ul style="list-style-type: none"> <li>Performing the Services,</li> <li>Auditing,</li> <li>Security Purposes,</li> <li>Internal R&amp;D,</li> <li>Short-term use,</li> <li>Quality Purposes,</li> <li>Web Traffic Analysis,</li> <li>Advertising,</li> <li>Analysis of Promotions,</li> <li>Safety</li> </ul>	<ul style="list-style-type: none"> <li>Our affiliates and subsidiaries,</li> <li>Service providers,</li> <li>Data analytics providers,</li> <li>Operating systems and platforms,</li> <li>Advertising and social networks.</li> </ul>
<p><b>Sensitive Personal Information:</b> including social security, driver’s license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; biometric information processed to identify you, or precise geolocation.</p>	<ul style="list-style-type: none"> <li>You,</li> <li>Your Use of Our Website,</li> <li>Your Use of Mobile Applications,</li> <li>Affiliates, Subsidiaries or Vendors</li> </ul>	<ul style="list-style-type: none"> <li>Performing the Services,</li> <li>Auditing,</li> <li>Security Purposes,</li> <li>Internal R&amp;D,</li> <li>Short-term use,</li> <li>Quality Purposes,</li> <li>Safety</li> </ul>	<ul style="list-style-type: none"> <li>Our affiliates and subsidiaries,</li> <li>Service providers,</li> <li>Professional services organisations,</li> <li>Government entities.</li> </ul>

**Categories of Sources Explained:** in the 12 months prior to the effective date of the Privacy Statement, Convera may have collected Personal Information about you from the following Categories of Sources:

- You:* we may collect information directly from you, for example, through your account, transaction forms and your interactions with Convera partners or through providing customer support or consultation, including using email, postal mail, call centres or live chat;
- Your Use of Our Website:* we may collect information from you or your device through your use of our Website, including online forms, registrations for loyalty and rewards programmes or competitions, and other online Services we offer (some of which may be

managed by third parties on behalf of Convera ) or through automated means such as communications protocols, email communications and cookies or similar technologies as described in the Privacy Statement section titled "[Internet Technologies](#)";

- *Affiliates, Subsidiaries or Vendors:* we may collect information about you from our affiliates, subsidiaries or vendors who provide services on our behalf;
- *Third parties:* we may collect information from other sources such as banks, financial institutions, commercial sources, or law enforcement bodies;
- *Your Use of Mobile Applications:* we may collect information from you or your device where you have enabled certain permissions (e.g., geolocation) or through your use of mobile applications (some of which may be managed by third parties on behalf of Convera);
- *Social Media Networks or Publicly Available Sources:* we may collect information about you from social media or other public data sources; and
- *Advertising Networks:* we may collect information about you from advertising networks so we can serve you with advertisements we believe may be of interest to you.

**Business Purposes Explained:** in the 12 months prior to the effective date of the Privacy Statement, Convera may have shared your Personal Information for the following Business Purposes:

- *Auditing:* related to our interactions with you and any concurrent transactions, including, but not limited to, counting ad impressions, verifying positioning and quality of ad impressions, and auditing compliance with applicable standards;
- *Security Purposes:* detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity and prosecuting those responsible for that activity;
- *Debugging:* debugging to identify and repair errors that impair the intended functionality of our systems;
- *Short-term use:* short term, transient use, including, but not limited to, the contextual customisation of ads shown as part of your interactions with us;
- *Performing the Services:* in addition to the purposes described in the Privacy Statement, maintaining or servicing accounts, identifying and authenticating you, providing customer service, processing or fulfilling orders and transactions, verifying your information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services;
- *Internal R&D:* undertaking internal research for technological development and demonstration; and
- *Quality Purposes:* undertaking activities to verify or maintain the quality or safety of the Services and to improve, upgrade or enhance the Services.

**Categories of Third Parties Explained:** in the 12 months prior to the effective date of the Privacy Statement, Convera may have shared your Personal Information with the following Categories of Third Parties:

- *Our affiliates and subsidiaries;*

- *Service providers*: relating to hosting and internet services, business and communication tools, Customer Relationship Management (CRM), document management, payment processes, identity verification, payments and fraud risk management, and marketing;
- *Our business partners*: who facilitate our payment transactions or provide specific Services you have requested;
- *Professional services organisations*: such as law firms and independent auditors;
- *Data analytics providers*;
- *Operating systems and platforms*;
- *Advertising and social networks*: advertising and social networks (who may combine your personal information with their own records, and records available from other sources for their own marketing purposes); and
- *Government entities*: government entities including law enforcement agencies;

## Retention of Personal Information

We retain your personal information for as long as needed, or permitted, based on the reason we obtained it (consistent with applicable law). When deciding how long to keep your personal information, we consider whether we have an ongoing relationship with you, are subject to any legal obligations (e.g., any laws that require us to keep records for a certain period of time before we can delete them), or whether we have taken any legal positions (e.g., issued any legal holds or otherwise need to preserve the information). Rather than delete your data, we may also deidentify it by removing identifying details. If we deidentify the data, we will not attempt to reidentify it.

## Sale of Personal Information

Convera does not sell your personal information to third parties in exchange for money. Convera does participate in advertising, marketing and analytic programmes from which we and third parties with whom we contract may derive value; such exchanges may constitute a “sale” or “sharing” as those terms are defined under applicable law. While participating in the above programmes, in the 12 months prior to the effective date of the Privacy Statement, Convera may have “sold” or “shared” your personal information to a third party for advertising, marketing, and analytics purposes. Convera may have “sold” or “shared” the following categories of personal information including:

- Identifiers: contact information, for example your name, email address and telephone number; and
- Internet and Other Electronic Network Activity Information: including the host from which you access the Internet, your IP address or device advertising ID, information about your device (such as device properties, settings, applications, storage and usage information), mobile application, browser and operating system software, social profile and network information, the date and time you access our websites and the address of the site from which you linked to our website when you visit us.

Convera does not sell or share personal information of individuals we know are under 16 years of age.

## California Residents Rights

California residents have certain rights under the CCPA relating to their personal information. Note that these rights only apply to personal information we process in our capacity as an entity that determines the purposes and means of processing (i.e., as a business or controller). If your relationship with us is through one of our business clients, you must submit your privacy rights request directly to the client with whom you have a primary relationship.

In general, California residents have the following rights, subject to certain exceptions:

- **Right to Know/Access.** You have the right to request a copy of the specific pieces of personal information we have collected about you, and certain information about our processing activities that may be available to you in this Privacy Statement.
- **Right to Correct.** You have the right to request we correct incorrect personal information.
- **Right to Delete.** You have the right to request we delete your personal information.
- **Right to Opt-Out of Sales and Sharing.** You have the right to opt-out of “sales” and “sharing” of your personal information, as those terms are defined under the CCPA. To exercise your right to opt-out, please use our cookie preferences centre available [here](#).
- **Right to Limit Use of Sensitive Personal Information.** You have the right to ask us to limit our use of your sensitive personal information to certain purposes. However, we do not engage in uses or disclosures of sensitive personal information that would trigger this right under the CCPA.
- **Right to Non-Discrimination.** We will not discriminate against you in terms of price or service level for exercising any of your privacy rights.

**Exercising Your CCPA Rights:** If you are a California resident, you can exercise the above rights by emailing us at [privacymatters@convera.com](mailto:privacymatters@convera.com) or by submitting a request via [webform](#). Before responding to your request we must verify your identity. Please provide your full name, the email address you use to interact with us, and your address or phone number if you have provided this to us. We will take steps to verify your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information in order to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

Convera cannot connect individual consumers to passive website visits which may affect our ability to respond to certain requests. Convera has implemented the capability for the user to manage cookies on our websites and will only read or write cookies based on your preference level. When you visit our website, you will be presented with a banner instructing you how to manage your preferences.

You may also designate an authorised agent to make a personal information request on your behalf. If you choose to designate an agent, we may require the authorized agent to provide us with evidence of your written permission to make your request and may ask you to verify your own identity directly with us. For your security, we may deny a request from an agent that does not submit proof that they have been authorised by you to act on your behalf.



## **Biometric Information Policy**

Where permitted by law, we may use a third-party service provider that employs ID scanning and facial recognition technology to verify your identity.

To provide these services for Convera, the service provider may collect, extract and store a facial scan from your identity document and a facial scan from your photograph and compare these scans to verify your identity. The facial scans generated and used by the service provider may be considered “biometric information” or “biometric identifiers” under applicable law. Based on the results of the comparison, the service provider may advise us whether your identity was verified. We will use the results of the comparison for the purpose of verifying or authenticating your identity and to detect and prevent fraud in compliance with applicable “Know Your Customer” and anti-money laundering and sanctions screening obligations.

Unless otherwise required by law, the biometric information is accessible only to our service provider and its respective service providers who process the data on our behalf to accomplish the purposes above and who are contractually committed to confidentiality and protection of data. The service provider will destroy the facial scans post-processing as instructed to do so by us, unless further retention is required by law.

## **Contact**

Contact for More Information: for questions or concerns about our Privacy Statement and privacy practices, please contact us as specified in the “[Contacting Us](#)” section of the Privacy Statement.

## Convera Legal Entities

Convera Legal Name of Entity	Contact Information / Address
Convera Australia Pty Ltd	Level 12 1 Margaret Street , Sydney NSW, New South Wales, 2000 Australia
Convera Canada ULC	1500-100 Yonge Street, Toronto, Ontario, M5C2W1, Canada
Convera Europe Financial S.A.	OBH Building, 6b rue du Fort Niedergrunewald, L-2226 Luxembourg
Convera Europe S.A	OBH Building, 6b rue du Fort Niedergrunewald, L-2226 Luxembourg
Convera Hong Kong Ltd	Unit 2210-18, Tower 1, Millennium City 1, 388 Kwun Tong Road, Kwun Tong, Kowloon, Hong Kong
Convera Japan KK	c/o Kusunoki, Iwasaki & Sawano, Holland Hills Mori Tower 11F 5-11-1, Toranomom, Minato-ku, Tokyo 105-0001, Japan
Convera Malta Financial Limited	Avenue 77, Triq in-Negozju, Zone 3, Central Business District, Birkirkara, CBD3010, Malta
Convera Singapore Financial Pte Ltd	77 Robinson Road, #35-01 Robinson 77 Singapore, 068896
Convera Singapore Pte Ltd	77 Robinson Road, #35-01 Robinson 77 Singapore, 068896
Convera Switzerland, LLC	The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street
Convera UK Financial Ltd	Alphabeta Building, 3rd Floor, 14-18 Finsbury Square, London, EC2A 1AH, United Kingdom
Convera UK Ltd	Alphabeta Building, 3rd Floor, 14-18 Finsbury Square, London, EC2A 1AH, United Kingdom
Convera USA, LLC	The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street