



## PRIVACY POLICY

Last modified: October 2025

### 1. INTRODUCTION

Colson Group ("Company" or "We") respects your privacy and is committed to protecting it through our compliance with this Privacy Notice ("Notice").

This Notice describes the types of information we may collect from you or that you may provide when you visit any of our websites (collectively, the "Websites") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

Please read this Notice carefully to understand our policies and practices regarding your information and how we will treat it. Please also take time to review our Website's Terms of Use. Your access and use of the Website is subject to our Terms of Use and this Notice is expressly incorporated into the Website Terms of Use.

This Notice may change from time to time. Your continued use of the Website after we make changes is deemed to be acceptance of those changes, so please check the Notice periodically for updates.

### 2. SCOPE OF THIS NOTICE (AND ITS LIMITATIONS)

This Notice applies to information we collect on the Website.

This Notice does not apply to information collected by us offline, by virtue of a transaction (if you are our customer), in relation to employment (if you are our potential employee, employee or contractor), or any other website.

This Notice also does not apply to third-party websites linked on our Website. We have no control over these third-party websites, apps or services and this Privacy Notice does not apply to your interaction with the relevant third parties.

For details about your rights related to our collection and use of your data, navigate to the "YOUR PRIVACY RIGHTS" section below, as well as the Addenda specific to Site visitors from the EU/UK and Canada.

### 3. HOW WE COLLECT PERSONAL INFORMATION

We use the term "personal information" to describe information that can reasonably be associated with you and can be used to identify you. Personal information does not include information that has been deidentified or aggregated. We collect and receive personal information through the following methods:

- **Personal information you provide to us.** You may give us your personal information directly, for example, when you contact us with inquiries, complete forms on our Website, subscribe to receive our marketing communications or provide feedback to us.
- **Personal information we collect automatically, including through cookies and other similar technologies.** When you access and use our Website, we may collect Technical Data and Usage Data automatically, including through our use of cookies and other similar

technologies. For more information about our use of cookies and other similar technologies, please see the [Cookies](#) section.

- **Personal information we obtain from third parties.** We may obtain personal information from third parties. Such third parties may include event suppliers and organizations we work with, analytics providers, data suppliers, third-party directories and third parties that provide technical services to us so that we can provide our Website. They may also include social networks and other technology providers (for instances, when you click on one of our Facebook or Google ads).
- **Personal data that is publicly available.** We may collect personal data that is available from public sources or that you or a third party may otherwise publish (for example on websites, posts on social media platforms, or speeches at events).

#### 4. CATEGORIES OF PERSONAL INFORMATION WE COLLECT

- **Identity Data.** Name (first, middle, and last); and title.
- **Contact Data.** Email address; telephone number; social media handle; and postal/delivery address.
- **Communications Data** includes correspondence or messages (including form submissions via the Site, surveys, emails, SMS or chat or social media messages or comments), the nature of your inquiry and other personal information which you choose to provide to us through these sources.
- **Professional Data.** Job title; and organization that you represent (where you or your organization supplies products or services to us or purchases same from us).
- **Usage Data.** Data observed or collected in relation to browsing activity on our Website, interaction with our emails, interaction with ads that you see as a result of the activities described in the [Online Advertising Activities](#)
- section. This may include information about pageviews and events on our Website; information about the webpage or other source that users were previously on before reaching our Website; information about when a browsing session started and ended; information about views of and clicks on our ads, together with advertising or other identifiers associated with a user or their device (e.g. a device's IDFA [iOS] or AAID [Android]) or advertising cookie identifiers.
- **Technical Data.** IP address; details of the Website that you are viewing, such as full web page URL; browser type, device type and operating system and any other information available to us about the device you are using; location data, including the geographic location (which may be approximate, like the city or region you are in, or more precise) of a device derived from IP address, and any other data collected for technical diagnostics purposes), and any relevant unique identifiers assigned to a device or browser (including cookie identifiers)
- **Advertising Partner Data.** Information obtained independently by our Advertising Partners as described in the [Online Advertising Activities](#)
- section. This may include unique identifiers and a profile of your possible interests and characteristics, which may have been built by observing your activity on websites, apps and other digital properties, including those operated by third parties, that use our Advertising Partners' services. Advertising Partner Data may include identifiers such as cookie IDs,

device IDs, IP addresses, or hashed contact information, as well as information about interactions with our Website and ads. Advertising Partners may combine this information with their own data to create or enhance audience profiles or measure ad effectiveness. You can review and manage your Advertising Partner consent preferences in our Cookie Preferences Center, powered by Usercentrics, accessible through the “Privacy Settings” link in the footer of our Website.

- **Marketing Data.** Marketing preferences; and service communication preferences.

#### **More About Information We Collect Through Automatic Data Collection Technologies:**

The technologies we use for this automatic data collection may include:

- **Cookies.** Cookies are alphanumeric identifiers that we transfer to your device’s hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Website, while others support the security and performance of the Website, or allow us to track activity and usage data within the Website.
  - **Essential Cookies:** These are required for the site to function (e.g., load pages, remember your choices). They cannot be switched off in our systems.
  - **Analytics Cookies:** These help us understand how visitors use our site, such as which pages are most popular and how users move around the site. We use this information to improve performance and usability.
  - **Advertising Cookies:** These cookies allow us and our partners (like Google and Meta) to deliver relevant ads and measure campaign effectiveness. They may track your browsing across websites.
  - **Social Media Cookies:** These allow you to interact with social platforms (like Twitter or LinkedIn) and share content. When you use them, data may be sent to the platform provider.
  - **Support & Engagement Cookies:** These power tools like live chat or customer support widgets, which help us respond to your questions and improve service.
- **Pixel Tags.** Pixel tags (sometime called web beacons or clear GIFs) are tiny graphics with a unique identifier, similar in function to cookies. While cookies are stored locally on your device, pixel tags are embedded invisibly within web pages and online content. We may use these, in connection with our Website to, among other things, track the activities of users, help us manage content and compile usage statistics. We may also use these in HTML e-mails we send, to help us track e-mail response rates, identify when our e-mails are viewed, and track whether our e-mails are forwarded.
- **Local Storage Objects.** Local storage is a web storage mechanism that allows us to store data on a browser that persists even after the browser window is closed. Local storage may be used by our web servers to cache certain information in order enable faster loading of pages and content when you return to our Website. You can clear data stored in local storage through your browser. Please consult your browser help menu for more information.
- **Third-Party Analytics and Tools.** We use third party tools, including but not limited to Google Analytics, which are operated by third party companies. These third-party analytics companies may use cookies, pixels, and other similar tools to collect usage data about our Website in order to provide us with reports and metrics that help us evaluate usage of our Website and improve performance and user experiences. To learn more about Google’s

privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/partners/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent their data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

- **CADENAS PARTcommunity.** Our Website integrates the CADENAS PARTcommunity viewer, provided by CADENAS GmbH, to enable 3D CAD model viewing and downloads. CADENAS uses cookies and local storage entries (for example, JSESSIONID, PWEBSESSIONID, and PCOM\_IFRAME) that are necessary for the viewer's functionality. These items are categorized as Functional within our Cookie Preferences Center. If you decline Functional cookies, the CAD viewer and related downloads will be disabled.

We provide you with choices regarding the personal information you provide to us. You can use our Cookie Banner to refuse all non-essential cookies, accept all cookies or otherwise customize the cookie settings for the Website. You can also use your browser settings to reject certain cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.

The list of third-party tools and cookies in use, including CADENAS and analytics providers, is maintained dynamically within our Cookie Preferences Center managed by Usercentrics.

See our [Cookie Notice](#) for details about the tracking technologies on our Website.

## 5. HOW WE MAY USE YOUR INFORMATION

We may collect, use, disclose and otherwise process personal information for the following purposes:

- **Services and Support.** To enable our Website, communicate with you through the Website, provide troubleshooting, technical support, and for similar support purposes, respond to your inquiries, and otherwise fulfill your requests.
- **Analytics and Improvement.** To better understand how users access and use the Website, and for other research and analytical purposes, such as to evaluate, develop, and improve our Services and business operations, and for internal quality control and training purposes.
- **Communication.** To respond to your questions, send you requested materials and newsletters, as well as information and materials regarding our Services and our offerings. We may also use this information to send administrative information to you, for example, information regarding the Services and changes to our terms and policies.
- **Customization and Personalization.** To tailor content we may send or display on the Website and/or in providing our Services.
- **Marketing and Advertising.** For marketing, advertising, and promotional purposes. For example, to send you promotional information about our Services, including information about sales, discounts, and new offerings, as well any other information that you sign up to receive.
- **Research and Surveys.** To administer surveys and questionnaires, such as for market research or user satisfaction purposes.

- **Security and Protection of Rights.** To protect the Website and our business operations, and to protect our rights or those of our stakeholders; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party, or violations of our Terms of Use.
- **Compliance and Legal Process.** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding, to respond to a subpoena, warrant, court order, or other legal process, or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority.
- **Auditing, Reporting, and Other Internal Operations.** To conduct financial, tax and accounting audits, audits and assessments of our operations, including our privacy, security and financial controls, as well as for risk and compliance purposes. We may also use personal information to maintain appropriate business records and enforce our policies and procedures.
- **General Business and Operational Support.** To assess and implement mergers, acquisitions, reorganizations, bankruptcies, and other business transactions such as financings, and to administer our business, accounting, auditing, compliance, recordkeeping, and legal functions.

## 6. LAWFUL BASIS FOR PROCESSING PERSONAL INFORMATION

If you are located in a region that requires a legal basis for processing of personal data (such as the EEA or UK), we need a lawful basis pursuant to applicable law to collect, use and disclose your personal information where Huge is a controller. Our legal basis will depend on the information concerned and the context in which it is processed. For detailed information about the purposes for which we process the personal information set out in this Privacy Notice and the lawful basis we rely upon to do so, please refer to our [Processing Activities Schedule](#).

## 7. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

We will not disclose your personal information to third parties other than as described in this Notice unless we have your permission or are required or permitted to do so by law. We may share such information with our affiliates as necessary to carry out the purposes for which the information was supplied or collected. Similarly, third party contractors, consultants and/or vendors engaged by us to provide services may have access to your personal information. These third parties will be subject to their own data protection requirements providing the same or greater level of security provided by us and in most instances will also have entered into a written agreement with us which addresses access to and use of your personal information.

We may disclose the personal information we collect for the purposes described above with third parties as follows:

- **Vendors and Services Providers.** We may disclose personal information we collect to our service providers, processors, and others who perform functions on our behalf. These may

include, for example, IT service providers (e.g. Cadenas GmbH), help desk, analytics providers, consultants, auditors, and legal counsel.

- **Compliance and Legal Obligations.** We may disclose personal information to third parties to comply with our legal and compliance obligations and to respond to legal process. For example, we may disclose information in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement, including responding to national security or law enforcement disclosure requirements. This may include regulators, government entities, and law enforcement as required by law or legal process.
- **Security and Protection of Rights.** We may disclose personal information where we believe it is necessary to protect the Company or our Services, our rights and property, or the rights, property and safety of others. For example, we may disclose personal information in order to (i) prevent, detect, investigate and respond to fraud, unauthorized activities and access, illegal activities, and misuse of the Services, (ii) situations involving potential threats to the health, safety, or legal rights of any person or third party, or (iii) enforce, and detect, investigate and take action in response to violations of our Terms of Use. We may also disclose information, including personal information, related to litigation and other legal claims or proceedings in which we are involved, as well as for our internal accounting, auditing, compliance, recordkeeping, and legal functions.
- **In Support of Business Transfers.** If we, or our affiliates are, or may be acquired by, merged with, or invested in by another company, or if any of our assets are, or may be, transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. We may also share certain personal information as necessary prior to the completion of such a transaction or corporate transactions such as financings or restructurings, to lenders, auditors, and third-party advisors, including attorneys and consultants, as part of due diligence or as necessary to plan for a transaction.
- **Aggregate and Deidentified Information.** Notwithstanding anything else in this Notice, we may use, disclose, and otherwise process aggregate and deidentified information related to our business and the Services with third parties for quality control, analytics, research, development, and other purposes.
- **Other Disclosures.** We may disclose personal information in other ways not described above, but will notify you and, if necessary, obtain your consent.

## 8. YOUR PRIVACY RIGHTS

Depending on your jurisdiction and subject to certain limitations, you may have the following rights with respect to the personal information we process about you:

- **Right to know.** You may have the right to know about the categories and the specific personal information that we may collect, the purposes for collecting that personal information, the categories of third parties to whom we may disclose that personal information and whether we disclose personal information for business purposes or for commercial purposes that would be considered a “sale” or “share” of your information.

- **Right to data portability.** You may have the right to obtain a copy of the personal information about you that's being processed by us. To the extent it is technically feasible, we will provide that information to you in a usable and portable format

Upon receipt of a valid and verifiable request from you, we shall disclose to you both the categories and specific pieces of personal information we have collected about you, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting that personal information, the categories of third parties which whom we share that information. Your rights may be subject to certain limitations depending on the laws of your State.

- **Right to delete.** You may have the right to request that we delete any personal information we have about you unless retention of that information is permitted or required under applicable law. If you request deletion of your personal information, we may deny your request or may retain certain elements of your personal information if it is necessary for us or our vendors to:
  - Complete the transaction or request for which the personal information was collected;
  - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
  - Debug to identify and repair errors that impair existing intended functionality;
  - Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
  - To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
  - Comply with a legal obligation.
  - Otherwise use the personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
- **Right to correct.** You may have the right to request the correction of any personal information we maintain about you.
- **Right to withdraw consent** for any processing where we have requested your consent.

### ***Exercising Your Rights***

To exercise your rights as set out above, please contact us using our contact details described in the [\*\*“HOW TO CONTACT US”\*\*](#) section, indicating the type of right you would like to exercise and that you are making the request under an applicable U.S. state data privacy law.

In order to process your deletion and/or access request, we are permitted by law to collect certain information about you to verify your identity. If, however, we cannot verify your identity from the information already maintained by us, we may request additional information from you, which shall only be used for the purposes of verifying your identity, and for security or fraud-prevention purposes, such as a passport or driver's license.

Under the laws of your state, you may have the right to use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. We may also require that you verify (as consumer) verify your identity directly with us and confirm that you have provided the authorized agent permission to act on their behalf.

We will make every effort to respond to your request within 45 days from when you contacted us. If you have a complex request, the law may permit us to take longer to respond. We will still contact you within 45 days from when you contacted us to let you know we need more time.

If we decline to take action on a request that you have submitted, we will inform you of our reasons for doing so, and provide instructions for how to appeal the decision. Depending on your state of residence you may have the right to appeal within a reasonable period of time after you have received our decision. If you have this appeal right, within 45-60 days of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If we deny your appeal, we will provide you with a method for contacting your state attorney general's office to submit a complaint.

***Right to non-discrimination.***

You have the right not to receive discriminatory treatment by us for the exercise of your privacy rights as set forth in this Privacy Notice.

***Explicit Notice – Right to opt-out***

We and our Advertising Partners collect personal information (such as Technical Data) when you use our Website. We, and our Advertising Partners, may use this information to personalize the ads we deliver to you when you visit others' sites or use others' apps. To personalize the ads so that they may be more relevant to you, our Advertising Partners may share personal data with other third parties.

If you do not wish for us or our Advertising Partners to use and disclose your personal data in this manner, which may be considered a "sale" under applicable U.S. state privacy laws, select the applicable control from our "Do Not Sell or Share My Information" link on the Site.

If you access our Website from other devices or browsers, visit the link below from those devices or browsers to ensure your choice applies to the data collected when you use those devices or browsers. If you use different browsers, devices or platforms, you will need to opt out on each browser, device or platform. We also honor Global Privacy Control (GPC) browser signals as valid opt-out requests for "sale" and "sharing" under applicable U.S. state laws.

Our Cookie Notice / Cookie Preferences allows you to opt out of the sale or sharing of personal information for advertising purposes. Your opt-out choice will prevent future data sharing for such purposes but will not automatically remove data already collected by our Advertising Partners. To manage or delete previously collected data, please consult the privacy policies of those partners.

**9. INTERNATIONAL TRANSFER**

Information collected while you use the Website, including your personal information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your

jurisdiction. For individuals located in California and other states with privacy laws, this means your personal information may be accessed by our service providers or partners in jurisdictions outside the United States, including where our data hosting, analytics, or advertising providers operate. When we transfer your information, we take steps to protect it as described in this Notice.

If you are located outside the United States and choose to provide information to us, please note that we may transfer the information, including your personal information, to the United States and process it there. In order to provide adequate protection for the data transfer, we have in place contractual arrangements with our subsidiaries, affiliates and business partners in respect of such transfers. By utilizing our Website, you authorize the international transfer of your data, to the United States, where we are based, and to other locations where we and/or our service providers operate.

## **10. HOW WE SECURE PERSONAL INFORMATION**

We are committed to keeping personal information secure and we have implemented information security policies, rules and technical measures to protect personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, our personnel and data processors (third parties that process personal data on our behalf) are obliged to respect the confidentiality of the personal information relating to users of our Website and those who purchase our Services.

## **11. HOW LONG WE KEEP PERSONAL INFORMATION**

We will only keep your personal information for as long as necessary for the purposes set out in this Privacy Notice. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

If any personal information is only useful for a short period (e.g. for a specific activity, promotion or marketing campaign), we will not retain it for longer than the period for which it is used by us.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal information on a suppression list indefinitely so that we know not to send you further marketing communications in the future. However, we will not use this personal information to send you further marketing unless you subsequently opt back in to receive such marketing.

## **12. CHILDREN UNDER THE AGE OF 13**

Our Website is not intended for children under 13 years of age and do not knowingly collect personal information from children under 13. No one under age 13 may provide any information to or on the Website. If you are under 13, do not use or provide any information on the Website. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us using the information in our "HOW TO CONTACT US" section in this Notice.

## **13. CHANGES TO OUR PRIVACY NOTICE**

It is our policy to post any changes we make to our Notice on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website. The date the Notice was last revised is identified at the top of the page. You are responsible for periodically visiting the Website and this Notice to check for any changes.

#### **14. HOW TO CONTACT US**

To ask questions or comment about this Notice and our privacy practices, contact us at:

Colson Group – Privacy Rights  
203 Kerth Street  
Saint Joseph, Michigan 49085

or via our toll-free number: 1 (800) 253-0868

To contact our Data Protection Officer please see the [EU/UK](#) or [Canadian Addenda](#) to this Notice.

## **PROCESSING ACTIVITIES SCHEDULE**

This Schedule sets out detailed information about the purposes for which we process personal information as set out in this Privacy Notice and the lawful bases we rely on to do so.

This Schedule is split into the following sections – please click on the link below to be taken to the relevant section:

1. [Providing our Website and carrying out other online activities](#)
2. [Customer Services, Feedback and Relationship Management](#)
3. [Insight and Analysis, Data Improvement and Personalization](#)
4. [Online Advertising Activities](#)
5. [Other Advertising and Marketing Activities](#)
6. [Business Administration, Compliance and Legal Affairs](#)

## 1. Providing our Website and carrying out other online activities

Purpose and Personal Data Processed	Description	Lawful Basis
<b>Delivery of our Website</b>  <i>Technical Data</i>	<p>To provide our Website to you, including ensuring that we are showing you the correct notices and information, and recording your preferences in relation to our <u>Cookies</u>.</p> <p><u>Essential Cookies</u> are used on our Website for this purpose. Please see the <u>Cookies</u> section for further information.</p>	<p>Legitimate interests – to provide our Website effectively.</p> <p>Compliance with a legal obligation.</p> <p>Performance of a contract.</p>
<b>Support, maintenance and security</b>  <i>Identity Data</i> <i>Contact Data</i> <i>Technical Data</i> <i>Registration Data</i>	<p>To administer and protect our Website and users (including troubleshooting, fixing errors, analysis, testing, system maintenance, support, and security, including for fraud monitoring and prevention).</p> <p>To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Website.</p> <p>To request feedback and to contact you about your use of our Website.</p> <p><u>Essential Cookies</u> are used on our Website for this purpose. Please see the <u>Cookies</u> section for further information.</p>	<p>Legitimate interests – to run our business and to protect us and our users from harm.</p> <p>Compliance with a legal obligation.</p>
<b>Website development and improvement</b>  <i>Usage Data</i>	<p>To develop and improve our Website, including content that we make available, through insight and analysis that we carry out in relation to the use</p>	<p>Consent (where non-essential Cookies are used on our Website).</p>

<b>Purpose and Personal Data Processed</b>	<b>Description</b>	<b>Lawful Basis</b>
<i>Technical Data</i>	<p>of our Website as described in the <u>Insight and Analysis</u> section.</p> <p>Non-essential Cookies are used on our Website for this purpose. Please see the <u>Cookies</u> section for further information.</p>	<p>Legitimate interests – to improve and enhance our Website (where non-essential Cookies are not used).</p>
<b>Personalization of our Website</b> <i>Usage Data</i> <i>Technical Data</i> <i>Profile Data</i>	<p>To personalize user experiences when using our Website, such as showing our users content and Website features that we think may be of interest or relevance to our users.</p> <p>Non-essential Cookies are used on our Website for this purpose. Please see the <u>Cookies</u> section for further information.</p> <p>In addition, activities described in the <u>Personalization</u> section may be relied on to carry out this activity.</p>	<p>Consent (where non-essential Cookies are used on our Website).</p> <p>Legitimate interests – to give users of our Website the best experience (where non-essential Cookies are not used).</p>

## 2. Customer Services, Feedback and Relationship Management

Purpose and Personal Data Processed	Description	Lawful Basis
<b>Customer services and general inquiries</b> <i>Identity Data</i> <i>Contact Data</i> <i>Transaction Data</i> <i>Profile Data</i> <i>Professional Data</i> <i>Communications Data</i>	<p>To manage and respond to any inquiry that you submit to us.</p>	<p>Legitimate interests – to help with your inquiry, provide a good standard of service and improve our customer services.</p>
<b>Social media pages and insights</b> <i>Identity Data</i> <i>Contact Data</i> <i>Social Media Data</i>	<p>To publish pages on social media (including LinkedIn, Facebook, X or Instagram) relating to our Website, Services and business. These pages help social media users discover and engage with us, and help us promote, and keep social media users updated about, our business.</p> <p>To gain insight into our social media pages, we may receive insights from the third-party provider of the social media platform about how users interact with our pages. We receive this information so that we can understand how many people saw our social media content, which content people are engaging with the most, actions users are taking on our pages (such as whether they are visiting our Website after visiting our pages, clicking on any content), and the demographics (such as age, gender and location) of those that view our social media pages. These insights are derived from personal data that the third-party provider of the social</p>	<p>Legitimate interests – to improve our online presence and promote our Website and Services via social media.</p> <p>Legitimate interests – to improve the content that we post on social media, including to ensure that our content is relevant to persons that we would like to engage with on social media.</p>

<b>Purpose and Personal Data Processed</b>	<b>Description</b>	<b>Lawful Basis</b>
	<p>media platform processes and are only provided to us in the form of anonymous and aggregate statistics – we do not receive your personal data or any information that we can use to identify you when we receive these insights.</p> <p>In addition, we may also see who has ‘liked’ or shared content that we post on social media (including when you interact with any ‘like’ or similar embedded feature on our Website).</p> <p>Note, we may be joint controllers with the relevant social media platform in relation to the insights that we receive. For more information, please see the <a href="#">Advertising and Social Media Partners</a> section.</p>	
<b>Managing our relationship with you or the organization you work for</b> <i>Identity Data</i> <i>Contact Data</i> <i>Profile Data</i> <i>Transaction Data</i> <i>Professional Data</i> <i>Communications Data</i>	<p>To manage our relationship with you or the organization you work for (where your organization is our client or supplier to), including to contact you about any matter concerning our Services, to contact our suppliers about goods or services that we have purchased or may purchase from them, and to provide you with other important information (including about changes to our terms and conditions or this Notice).</p>	<p>Legitimate interests – to provide those that we work with the best experience and to ensure effective business administration.</p> <p>Legitimate interests – to effectively manage our supply chains.</p> <p>Compliance with a legal obligation – to comply with our consumer rights and privacy obligations.</p>

<b>Purpose and Personal Data Processed</b>	<b>Description</b>	<b>Lawful Basis</b>
<b>Survey and feedback</b> <i>Identity Data</i> <i>Contact Data</i> <i>Transaction Data</i> <i>Profile Data</i> <i>Communications Data</i> <i>Advertising Partner Data</i>	<p>To help us to monitor and improve our Website and Services, to assist with the selection of future service lines, and to train our personnel, we may carry out surveys or ask you for feedback.</p>	<p>Legitimate interests – to improve our Website and Services and provide them in an effective way.</p>
<b>Public Relations and Media</b> <i>Identity Data</i> <i>Contact Data</i> <i>Profile Data</i> <i>Professional Data</i> <i>Communications Data</i>	<p>To respond to media inquiries and requests (including interview requests, requests for comment, and requests for information) that we receive, or address reports in the media that concern us, we may process personal data relating to journalists, reporters and other media professionals.</p> <p>We may also send these persons corporate communications and other information by email for media and public relations purposes.</p>	<p>Legitimate interests – to ensure that our business is fairly and accurately represented in the media.</p> <p>Legitimate interests – to provide the right information to those who request it or otherwise have an interest in receiving it.</p>

### 3. Insight and Analysis, Data Improvement and Personalization

Purpose and Personal Data Processed	Description	Lawful Basis
<b>Insight and analysis</b> <i>Technical Data</i> <i>Usage Data</i> <i>Professional Data</i> <i>Communications Data</i> <i>Profile Data</i> <i>Advertising Partner Data</i>	<p>To carry out insight and analytics, including:</p> <ul style="list-style-type: none"> <li>to carry out insight and analytics in relation to our Website, including counting user visits to our Website, combining this with general insights about our users' interests and browsing habits so that we can understand the type of user that our Website appeals to, and learning what content and features of our Website are most popular – these insights and analytics are used for the purposes described in the <u>Website development and improvement</u> section;</li> <li>to count the open rate and measure the effectiveness of our marketing emails;</li> <li>to measure the effectiveness of our online advertising, including to generate aggregate statistics that do not identify individuals (for example, counting how many people viewed or clicked on our ads and were redirected to our Website through one of our ads);</li> <li>to gain general insights about clients and their purchase or use of our Services, so that we can develop future service lines; and</li> <li>to analyze the success of our events, including assessing</li> </ul>	<p>Legitimate interests – to develop and improve our Website and our Services and to support other activities described in this Notice (where non-essential Cookies are not enabled).</p> <p>Consent (where non-essential Cookies are enabled).</p>

<b>Purpose and Personal Data Processed</b>	<b>Description</b>	<b>Lawful Basis</b>
	<p>sign-up rates, monitoring social media, online forums, and other online content, and collecting and analyzing event feedback.</p> <p>Some of the insights and analysis that we gather may be used by us to support the activities described in the <u>Personalization</u> section.</p> <p>Non-essential Cookies are used on our Website for this purpose. Please see the <u>Cookies</u> section for further information.</p>	
<p><b>Data improvement</b></p> <p><i>Identity Data</i>  <i>Contact Data</i>  <i>Profile Data</i></p>	<p>To improve the quality of our data through the use of services and the data of third-party data suppliers, including to:</p> <ul style="list-style-type: none"> <li>• enrich the data we hold about our clients and users (for example, adding data to information that we already hold);</li> <li>• carry out data cleansing and tracing (for example, identifying redundant records and updating records);</li> <li>• segment our clients and users (for example, identifying target sub-groups of our clients or users).</li> </ul> <p>Some of the activities set out in this section, may be used by us to support the activities described in the <u>Personalization</u> section.</p>	<p>Legitimate interests – to ensure the effective and efficient use of data and to support other activities described in this Privacy Notice.</p> <p>Compliance with a legal obligation.</p>

<b>Purpose and Personal Data Processed</b>	<b>Description</b>	<b>Lawful Basis</b>
<p><b>Personalization</b></p> <p><i>Technical Data Usage Data Profile Data Advertising Partner Data</i></p>	<p>To tailor the information and experiences provided to our users and clients, so that they are more likely to be of interest and relevance, including in relation to:</p> <ul style="list-style-type: none"> <li>● user experiences on our Website as described in the <u>Personalization of our Website</u> section;</li> <li>● our marketing communications described in the <u>Marketing communications</u> section;</li> <li>● our online advertising described in the <u>Online Advertising Activities</u> section.</li> </ul> <p>The activities described in the <u>Insight and Analysis</u> and <u>Data Improvement</u> sections may be relied on to carry out this activity.</p> <p>Non-essential Cookies are used our Website for this purpose. Please see the <u>Cookies</u> section for further information.</p>	<p>Legitimate interests – to give users and clients the best experience, and to support our marketing and advertising activities, where non-essential Cookies are not enabled.</p> <p>Consent (where non-essential Cookies are enabled).</p>

#### 4. Online Advertising Activities

We may share your personal data with, or otherwise use the services of, third-party social media and advertising technology companies (“**Advertising Partners**”), so that we can advertise our business, including our Website and our Services, on websites, apps, and other digital platforms, including social media, that are operated by third parties (“**Third-party Sites**”).

Certain online advertising activities, such as Meta Page Insights or similar analytics tools, may be carried out jointly with social media platforms. In these cases, Colson Group and the relevant platform may act as joint controllers for limited purposes, in accordance with the platform’s published controller terms.

Our online advertising activities are explained in more detail below. Where required by applicable law, advertising cookies and similar tracking technologies are only activated after you have given consent through our Cookie Preferences Center. If you see one of our ads, this may be the result of one or a combination of these activities.

Please note:

- Some of the advertising that you see based on these activities may be personalized to you. Please see the Personalization section for further information.
- We may be joint controllers with our Advertising Partners, or our Advertising Partners may be independent controllers, in relation to the activities described in this section. For more information, please see the Advertising and Social Media Partners section.

Purpose and Personal Data Processed	Description	Lawful Basis
<b>‘Custom Audience’ advertising (also known as ‘Custom Match’ advertising)</b>  <i>Contact Data</i> <i>Usage Data</i> (identifiers only) <i>Advertising Partner Data</i>	<p>To enable our Advertising Partners to ‘match’ identifiers which we have obtained (for example, your email address or your device’s advertising identifier) with identifiers that are available to our Advertising Partners, including those relating to registered users of Third-party Sites.</p> <p>The matched identifiers are known as a ‘custom audience’. We and our Advertising Partners create this custom audience so that our ads will be displayed to individuals whose identifiers are included in the custom audience when those individuals use the relevant Third-party Site (e.g. to</p>	<p>Consent (in relation to data that we share with our Advertising Partners).</p> <p>Legitimate Interests – to increase the effectiveness of our advertising (to the extent we are a controller of Advertising Partner Data[ or we have not obtained your consent).</p>

<b>Purpose and Personal Data Processed</b>	<b>Description</b>	<b>Lawful Basis</b>
	<p>show you an ad on your Facebook newsfeed).</p> <p>Our custom audience may also be used to exclude individuals from seeing our ads (because we want to show ads to people who are not our existing clients or users).</p>	
<p><b>‘Lookalike Audience’ advertising</b></p> <p><i>Contact Data</i> <i>Usage Data</i> <i>(identifiers only)</i></p> <p><i>Advertising Partner Data</i></p>	<p>To ask our Advertising Partners to find other people that share similar interests and characteristics to the individuals who are in our custom audience (as described in the <u>‘Custom Audience’ advertising</u> section), so that we can show our ads to those other individuals when they use Third-party Sites.</p> <p>This activity is known as ‘lookalike audience’ advertising because the individuals who see our ads ‘look like’ the individuals who form part of our custom audience.</p> <p>For example, our Advertising Partners may use their data to identify that 70% of our custom audience are men aged between 20-25. We then ask our Advertising Partners to show our ads to other men aged between 20-25.</p> <p>Our Advertising Partners do not provide their Advertising Partner Data to us, but they may provide us with aggregate insights about the individuals who are shown our ads (for example, their age, gender, approximate location and interests).</p>	<p>Legitimate Interests – to increase the effectiveness of our advertising by finding new people who we may wish to advertise to.</p> <p>See the <u>‘Custom Audience’ advertising</u> section to understand the lawful basis we rely on to create our custom audience.</p>

<b>Purpose and Personal Data Processed</b>	<b>Description</b>	<b>Lawful Basis</b>
<p><b>Advertising on Third-party Sites using Cookies and our Advertising Partners' tools</b></p> <p><i>Technical Data Usage Data Advertising Partner Data</i></p>	<p>To display ads for our Services or that promote our business to you when you visit Third-party Sites, including to:</p> <ul style="list-style-type: none"> <li>● recognize you as a user of our Website and to display ads for Services that you have viewed on our Website; and</li> <li>● reach users of Third-party Sites who meet certain criteria determined by us or our Advertising Partners using selection tools made available by our Advertising Partners (for example, users who are likely to be men or are aged between 20-25).</li> </ul> <p>Non-essential Cookies are used on our Website to recognize you as a user of our Website. Please see the <a href="#">Cookies</a> section for further information.</p> <p>In addition, our Advertising Partners may use non-essential Cookies on Third-party Sites, as well as Advertising Partner Data that they have independently collected, for this purpose. We are not responsible for these technologies and you should separately review the information provided to you on the Third-party Site about these technologies.</p>	<p>Consent (where non-essential Cookies are enabled on our Site).</p> <p>Legitimate interests – to increase the effectiveness of our advertising by displaying our ads to individuals who have previously shown an interest in our Services, or our business, or are most likely interested in our ads based on criteria determined by us and our Advertising Partners (where other personal data is used).</p>
<p><b>Measuring the effectiveness of our advertising</b></p> <p><i>Usage Data Technical Data</i></p>	<p>To determine how successful our other advertising activities described in this <a href="#">Online Advertising Activities</a></p>	<p>Consent (where non-essential Cookies are used on our Website).</p> <p>Legitimate interests – to understand the type of</p>

<b>Purpose and Personal Data Processed</b>	<b>Description</b>	<b>Lawful Basis</b>
<p><i>Advertising Partner Data</i></p>	<p>section have been, and to understand who has viewed or interacted with our ads.</p> <p>We may do this to:</p> <ul style="list-style-type: none"> <li>• generate insight and analysis about our advertising activities, as described in the <u>Insight and Analysis</u> section; and</li> <li>• personalize experiences, as described in the <u>Personalization</u> section.</li> </ul> <p>Non-essential Cookies are used on our Website to recognize you as a user of our Website. Please see the <u>Cookies</u> section for further information.</p> <p>In addition, our Advertising Partners may use non-essential Cookies on Third-party Sites, as well as Advertising Partner Data that they have independently collected, for this purpose. We are not responsible for these technologies and you should separately review the information provided to you on the Third-party Site about these technologies.</p>	<p>advertising and marketing content that is most likely to be of appeal (where other personal data is used).</p> <p>Legitimate interests – to increase the effectiveness of our advertising by collecting information about which of our ads an individual has responded to, so that we can show that individual similar ads, or other ads that may be of interest to them, in the future.</p>

## 5. Other Advertising and Marketing Activities

Purpose and Personal Data Processed	Description	Lawful Basis
<b>Marketing communications</b>  <i>Identity Data</i> <i>Contact Data</i> <i>Communications Data</i>	<p>To promote our Website, our Services, or to otherwise promote our business, via email, telephone or post.</p> <p>To ensure that the marketing content that is provided to you is more likely to be of interest, our marketing communications may be personalized. For more information, please see the <u>Personalization</u> section.</p>	<p>Consent (where marketing via email).</p> <p>Legitimate interests (where marketing via telephone and post) – to grow our business.</p> <p>You can unsubscribe from our email marketing by clicking the ‘unsubscribe’ link in our emails. You can also ask us to stop using your personal data for our direct marketing activities by contacting us using the details set out under the <u>HOW TO CONTACT US</u> section.</p>
<b>Third-party marketing (lead generation)</b>  <i>Identity Data</i> <i>Contact Data</i> <i>Profile Data</i> <i>Communications Data</i>	<p>To share your personal data with third-party partners to enable them to contact you to send marketing to you in relation to their products and services.</p>	<p>Consent.</p> <p>Legitimate interests – to provide marketing services to third parties and to help those third parties grow their business, and for our third-party partners’ legitimate interests to promote their business to you.</p>

## 6. Business Administration, Compliance and Legal Affairs

Purpose and Personal Data Processed	Description	Lawful Basis
<b>Business administration and legal compliance</b> <i>Identity Data</i> <i>Contact Data</i> <i>Profile Data</i> <i>Usage Data</i> <i>Technical Data</i> <i>Incident Data</i> <i>Communications Data</i> <i>Professional Data</i>	To comply with our legal obligations. To enforce our legal rights or defend against potential legal claims. To protect the rights of third parties. To facilitate a business transition such as a merger, reorganization, acquisition by another company, or sale of any of our assets.	Legitimate interests – to operate our business effectively. Compliance with a legal obligation.
<b>Security</b> <i>Identity Data</i> <i>Contact Data</i> <i>Technical Data</i> <i>Usage Data</i>	To protect our Website against fraudulent activity or other violations of our Website Terms of Use.	Legitimate interests – to prevent interference with the function of our Website and our ability to operate the Website securely.

## **SUPPLEMENT FOR EUROPEAN UNION AND UNITED KINGDOM RESIDENTS**

If you are located in the European Union (EU) or the United Kingdom (UK), you have specific rights under the General Data Protection Regulation (GDPR) and the UK GDPR. These rights are in addition to any other rights described in this Privacy Notice.

### **Legal Bases for Processing**

We process your personal information only when we have a valid legal basis. Please refer back to our Processing Activities Schedule for details about the purpose for which we collect your personal information and the legal basis for which we collect and process it. You may also refer to our Cookie Notice/Cookie Preferences to learn more about the cookies on our Site and customize your preferences.

### **Your Rights**

Subject to applicable law, you may exercise the following rights:

- **Right of Access** – Obtain confirmation of whether we process your personal information and receive a copy of it.
- **Right to Rectification** – Request correction of inaccurate or incomplete personal information.
- **Right to Erasure (“Right to be Forgotten”)** – Request deletion of your personal information in certain circumstances.
- **Right to Restrict Processing** – Request that we limit the processing of your personal information in certain cases.
- **Right to Data Portability** – Receive your personal information in a structured, commonly used, machine-readable format and request that we transfer it to another organization.
- **Right to Object** – Object to processing based on our legitimate interests, and object at any time to processing for direct marketing purposes.
- **Rights Related to Automated Decision-Making** – Not to be subject to decisions based solely on automated processing, including profiling, that have legal or similarly significant effects on you.

### **International Data Transfers**

Please refer to the section on INTERNATIONAL TRANSFER in the body of our Privacy Notice.

### **Contact Information**

To exercise your rights or raise questions about our practices, please contact us at:

Privacy Officer

Email: [jami.mckenna@colsongroup.com](mailto:jami.mckenna@colsongroup.com)

Phone: 1-872-337-1757

You also have the right to lodge a complaint with your local data protection authority (DPA) in the EU or with the UK Information Commissioner's Office (ICO) if you believe your rights have been infringed.

## **SUPPLEMENTAL INFORMATION FOR RESIDENTS OF CANADA**

If you are a resident of Canada, you have rights under applicable Canadian privacy laws, including the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and substantially similar provincial laws in Quebec, Alberta, and British Columbia. These rights are in addition to any other rights described in this Privacy Notice.

- **Right to Access** – You may request access to the personal information we hold about you and obtain details on how it is used and disclosed.
- **Right to Correction** – You may request that inaccurate, incomplete, or outdated personal information be corrected.
- **Right to Withdraw Consent** – Where we rely on your consent to process your personal information, you may withdraw that consent at any time, subject to legal or contractual restrictions and reasonable notice.
- **Right to Information** – You have the right to know why we collect your personal information, how it is used, and to whom it has been disclosed.
- **Right to Complain** – You may raise concerns with us at any time. You also have the right to file a complaint with the relevant privacy commissioner, including the Office of the Privacy Commissioner of Canada or your provincial commissioner, if you believe your rights have not been respected.

You may also refer to our Cookie Notice/Cookie Preferences to learn more about the cookies on our Site and customize your preferences.

### **Quebec Residents**

If you are a resident of the province of Quebec, additional rights apply to you under the *Act respecting the protection of personal information in the private sector* (CQLR c. P-39.1), as amended by Law 25. These include:

- **Right to Deletion (Right to be Forgotten)** – You may request that we stop disseminating your personal information or that we de-index or re-index hyperlinks attached to your name, in cases permitted by law.
- **Right to Data Portability** – You may request that we provide your personal information to you, or to another organization, in a structured, commonly used technological format.
- **Rights Regarding Automated Decision-Making** – If we make decisions based exclusively on automated processing of your personal information, you have the right to be informed and to request details about the personal information used, the reasons and principal factors leading to the decision, and to submit observations to a member of our team for review.

- **Right to Anonymization** – Once the purposes for which your personal information was collected are fulfilled, we may anonymize your personal information instead of deleting it.

### **International Data Transfers**

Please refer to the section on INTERNATIONAL TRANSFER in the body of our Privacy Notice.

### **Contact Information**

We are responsible for the personal information under our control and have appointed a Privacy Officer to oversee compliance with Canadian privacy laws. To exercise your rights, or if you have questions about our privacy practices, please contact us at:

Privacy Officer  
Email: [jami.mckenna@colsongroup.com](mailto:jami.mckenna@colsongroup.com)  
Phone: 1-872-337-1757