



Privacy Policy and Notice at Collection

Last updated 9/28/2023

WilliamsMarston LLC (“WilliamsMarston,” “we,” “us,” or “our”) is committed to privacy and data protection. This Privacy Policy and Notice at Collection (“Notice”) applies to information that WilliamsMarston collects on this website, through WilliamsMarston’s software applications, products, and services, and any other website or services authorized by WilliamsMarston that links to this Notice (collectively, the “**Services**”), as well as how we use and protect personal information.

YOUR PRIVACY IS IMPORTANT TO US. PLEASE READ THIS NOTICE TO LEARN ABOUT THE INFORMATION THAT WILLIAMSMARSTON COLLECTS FROM YOU AND HOW WILLIAMSMARSTON USES THAT INFORMATION.

This Notice describes the information that we collect (directly or indirectly) and why we collect it, what we do with the information we collect, and how you can manage personal information about you (defined below).

NOTICE AT COLLECTION

1. WHAT INFORMATION DOES WILLIAMSMARSTON COLLECT ABOUT ME AND WHY?

We collect information that identifies, describes, or is reasonably capable of being associated with you (“personal information”). The following discusses the categories of personal information we collect and have collected in the preceding 12 months, the sources we collect information from, and the business or commercial purposes use of personal information about you.

- **To provide you with the products and services that you have requested** - To administer our relationship with you and to carry out our obligations arising from the relationship between you and us, including internal accounting and administration purposes, to process payment for purchases or other services and to create and manage your account.

To provide you with products and services we may collect:

- *Identifiers.* Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address (“IP address”), email address, account name, or other similar identifiers.
- *Your opinions or other information.* For example, if you review the products you have purchased from us or provide information about products or concerns, and the brands and products you use.
- *Commercial information.* Records of products or services purchased, financial information, obtained, or considered, or other purchasing or consuming histories or tendencies.
- *Geolocation Data.* Such as physical location or movements. We collect your IP address and infer location such as city or postcode therefrom.
- *Internet or other similar network activity.* Such as browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.

- **For analytics purposes** - For example, we may analyze personal information about you including your location, products and/or services requested, time zone, IP address and URL visited, against our wider customer base for internal business purposes, such as generating statistics and developing marketing plans, to improve our services and products and the website. We may also aggregate and de-identify information about you to create customer segments and share with our affiliates and partners.

To perform analytics, we may collect and process:

- *Internet and network information*, as described in more detail in our [Cookie Policy](#), if you use our Services, we automatically collect information about your browsing and search history, interaction with the features of our Services, and responses to advertisements.
- **To provide you with marketing communications that you might be interested in** - If you choose to receive marketing communications from us, we may use personal information about you to keep you up to date with our latest products, services, surveys, announcements, upcoming events, sweepstakes, contests and other promotions via our newsletters, emails, or other communications. If you no longer wish to receive these marketing communications, details of how to opt-out are described in the section below marked “How do I stop receiving marketing communications?”

To provide marketing communications we may collect and process:

- *Identifiers*. Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- *Commercial information*. Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **For non-marketing communications** - We may use personal information about you to communicate with you about important information in relation to your account, the service you have requested, or other non-marketing communications. This includes: (i) to process and respond to your questions and/or inquiries; (ii) emailing you to verify your identity when you sign-up; (iii) emailing you where you have requested a password and/or username reset; (iv) notifying you that a particular service has been suspended for maintenance or terminated; (v) letting you know that we have updated this Notice or our Terms of Use; or (vi) letting you know about any products that you have requested or purchased. We will never contact you to ask for your password, please be careful if you receive any communications from people requesting this information.

To provide non-marketing communications we may collect and process:

- *Identifiers*. Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- **For product and service optimization, diagnostic, development, and management** - For example we may use personal information about you provided to us to:
 - administer our products, services, and this website;
 - ensure the security of our networks and of information;
 - improve and develop our products, services, website, and our other digital offerings (including to fix operational problems such as pages crashing and software bugs); and

To support site optimization and management we may collect and process:

- *Internet and network information*, as described in more detail in our [Cookie Policy](#), if you use our Services, we automatically collect information about your browsing and search history, interaction with the features of our Services, and responses to advertisements.

- **For fraud prevention and detection purposes and to protect and defend the rights and property of WilliamsMarston, our employees, and business partners.**
 - *Identifiers.* Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
 - *Internet or other electronic network activity information.* Device and system information, connection information, usage information, diagnostic data(including system/app/service error information, usage information during an error).
- **For employment application purposes** - For example, if you contact us in relation to your employment prospects, we will use personal information about you to consider you for current and future employment opportunities and to contact you with respect to employment opportunities at WilliamsMarston that you have expressed an interest in.

By selecting the Careers link you will be directed to a third-party recruitment services website, currently LinkedIn (“Recruitment Provider”). Your use of the Recruitment Provider’s services is governed by the Recruitment Provider terms of service and Privacy Notice available through the Recruitment Provider’s website.

To support employment consideration, we may collect and process:

- *Identifiers.* Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- *Professional, education, or employment-related information.* Such as current or past job history or performance evaluations, school, degree, and academic program.
- **Information that we collect automatically.** When you engage with WilliamsMarston we may use cookies and similar tracking technology to collect the following information about you automatically (for further information please see our [Cookies Policy](#) for more information):
 - *Internet or other electronic network activity information.* Such as browsing history, search history, information on your interaction with a website, application, or advertisement.
 - For example, when you visit the website, engage with WilliamsMarston content or with us digitally, we may collect certain information from your computer, tablet, or mobile phone (“Device”) such as your IP address, Device type (i.e., make and model), unique device identification numbers, browser-type and time zone settings
 - We may also collect information about how your Device has interacted with us including: the pages accessed and links clicked; how you navigate to and from the website (such as how you scroll over the site, which parts you click and how long you spend on each page); your preferences, the products and/or services that you have viewed or searched for; and crashes, download errors and response times.
 - *Geolocation Data.* Such as physical location or movements. We collect your IP address and infer location such as city or postcode therefrom.
 - For example, when you visit the website, engage with WilliamsMarston content or with us digitally, we may collect your broad geographic location (e.g., country or city-level location) from your Device.

We may link together different types of information or link information to personal information. If linked information directly or indirectly identifies an individual person, we treat the linked information as personal information. In this Notice, to “process” personal information means to perform any operation on personal information, whether or not by automated means, such as collection, recording, organizing, storing, adapting, use, disclosure, combining, erasing, or destroying. Where we need to collect personal information by law, or under the terms of the contract between us and you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to

provide you with products or Services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case.

Change of purpose

We will only use personal information about you for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use personal information about you for an unrelated purpose, we will notify you and we will explain the business purpose which allows us to do so.

Please note that we may process personal information about you without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

2. DOES WILLIAMSMARSTON SHARE PERSONAL INFORMATION?

During the past 12 months, we may have disclosed the categories of personal information listed in the section marked “What categories of personal information does WilliamsMarston collect about me?” to the following categories of recipients:

- **With our affiliates** – We may make personal information about you available to WilliamsMarston affiliated companies to allow us to provide our products and services to you, for the purposes described in this Notice, or as notified to you when we collect personal information about you.
- **With third parties for marketing purposes** - Certain promotions and events may offer you the opportunity to consent to receive marketing communications from our business. If you have given your **consent**, personal information about you may be used by such third party for the purposes stated at the point you enter the event and/or sign-up to receive the promotional updates.
- **With our service providers and business partners** - We engage third party service providers and business partners to perform functions on our behalf (for example, to support the delivery of our products, or the website). This includes but is not limited to sharing information with the following types of service providers or business partners:
 - *providers of marketing and customer relationship management databases and data management platforms* – that enable WilliamsMarston to manage information in a safe and efficient manner;
 - *data analysis firms* – that provide insights and help us to analyze trends using the data that we and they hold;
 - *customer support specialists* – that provide customer support services on our behalf for WilliamsMarston products and services;
 - *fulfilment companies* – this includes companies that manage your orders and ship your products, coordinate email campaigns, sweepstakes, contests, or promotions on our behalf;
 - *application development and web-hosting companies* – to enable us to manage and improve the website;
 - *information technology and related infrastructure providers;*
 - *email delivery providers;* and
 - *audit and professional service providers.*
- **As part of a business transfer** – WilliamsMarston may disclose personal information about you to an actual or potential buyer (and its agents and advisers) in relation to any actual or proposed divestiture, merger, acquisition, joint venture, bankruptcy, dissolution, reorganization, or any other similar transaction or proceeding.

- **To comply with laws** – WilliamsMarston may disclose personal information about you to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person; and
- **To any other person with your consent to the disclosure.**

WilliamsMarston may aggregate information collected through the Services and remove identifiers so that the information no longer identifies or can be used to identify an individual (“**Anonymized Information**”). WilliamsMarston shares Anonymized Information with third parties and does not limit third parties’ use of the Anonymized Information because it is no longer personal information.

We may collect or obtain information about you from marketing partners, social media platforms, data aggregators, location intelligence platforms, third party providers of business contact information, publicly available databases, and similar sources, for advertising and analytics purposes, so that we may offer you personalized features and offers tailored to your interests, and in order to offer you an overall better service. We will use this information where you have provided your consent to the third party or to WilliamsMarston, or where WilliamsMarston has a legitimate interest in using information about you in order to provide you with the content or service requested. We will combine this information with personal information provided by you, in order to identify prospective customers or products you’ll be interested in, to create more tailored advertising, and to improve the accuracy of our records.

3. HOW LONG DOES WILLIAMSMARSTON KEEP MY PERSONAL INFORMATION?

We retain personal information in identifiable form only for as long as necessary to fulfill the purposes for which the personal information was provided to WilliamsMarston or, if longer, to comply with legal obligations, to resolve disputes, to enforce agreements and similar essential purposes. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of personal information, the purposes for which we process personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

4. FOR WHAT BUSINESS PURPOSE CAN WILLIAMSMARSTON USE MY PERSONAL INFORMATION?

We are required to satisfy one or more of the reasons set out by applicable data privacy law before we can collect and use personal information about you.

Generally, our business purpose for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally rely on the following reasons to collect and use personal information about you:

- **Performance of a contract**

Using information about you may be necessary for us to perform our obligations under a contract with you or with a view to entering into such a contract. For example, where you have: (i) purchased services and/or products from us, we will need to use information about you to provide those services and/or products; or (ii) approached us in relation to employment opportunities, the collection and use of personal information about you is necessary to enable us to offer you the job role, process your acceptance of the offer, on-board you as an employee and fulfil our obligations as an employer.

- **Compliance with our legal obligations**

The collection and use of personal information about you may be necessary to enable us to meet our legal obligations. For example, to verify your identity and undertake necessary due diligence checks.

- **Pursuing our legitimate interests**

Where such processing is not overridden by your interests or fundamental rights, we are permitted to use personal information about you where it is necessary in order to pursue our legitimate interests, for example to operate the website and our other digital offerings, to improve our products and services, content, and our other digital offerings or to undertake marketing. We may have other legitimate interests and if appropriate we will make this clear to you at the relevant time.

- **Consent**

In some limited circumstances, we may rely on your consent to collect and use personal information about you. For example, we may rely on consent: (i) where you have approached us in relation to employment opportunities and have provided us with sensitive personal information, such as information in relation to your racial and ethnic origin, sexual orientation, religion, physical and mental health, disabilities, or trade union membership; or (ii) in relation to the sending of e-marketing or communications.

- If we rely on consent, this will be made clear to you at the time we request information about you. You can withdraw your consent at any point by using the mechanism provided at the time, or by contacting us using the contact details provided in the section “How do I contact WilliamsMarston?” of this Notice.

- **Vital interests**

In some instances, we may need to use personal information about you to protect your vital interests or those of another person.

You may not always be required to provide the personal information that we have requested. However, if you choose not to provide certain information, you may not be able to take advantage of some of our services. Any information that is so required is clearly marked as mandatory. If you would prefer that we not collect certain personal information from you, please do not provide us with any such information, or opt out of providing this information where applicable.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of personal information about you is mandatory or not (as well as of the possible consequences if you do not provide personal information about you).

If we collect and use personal information about you in reliance on our legitimate interests (or those of any third party), these interests will normally be as set out in this Notice; however, if this changes we will make clear to you at the relevant time what those legitimate interests are.

If you have any questions or need further information concerning the business purpose on which we collect and use personal information about you, please contact us using the contact details provided in the section below marked “How Do I Contact WilliamsMarston?”

5. WHAT ARE MY DATA PROTECTION CHOICES AND RIGHTS?

State consumer privacy laws may provide their residents with additional rights regarding our use of personal information. The following Section applies to individuals who reside in specific jurisdictions that provide additional privacy rights, including **California, Colorado, Connecticut, and Virginia**.

6.1 Your Rights and Choices

Right to Access Specific Information and Data Portability Right. You have the right to request that we disclose certain information to you about our collection and use of personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed personal information for a business purpose, the business purpose for which personal information was disclosed, and the personal information categories that each category of recipient obtained.

Right to Correct Information. You have the right to request we update personal information about you that is incorrect in our systems.

Right to Delete. You have the right to request that we delete any personal information about you that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) the personal information from our records, unless an exception applies.

Right to Opt-out of the sale or sharing of Personal Information for Cross-Contextual Behavioral Advertising. We do not sell or share Personal Information for cross-contextual behavioral advertising purposes.

Right to Limit Sensitive personal information Use. You have the right to limit the use of sensitive personal information regarding you.

Non-Discrimination. We will not discriminate against you for exercising any of your rights.

6.2 How to Exercise these Rights

To submit a request to exercise these rights you may use one of these three methods:

- **Email: privacy@williamsmarston.com**
- **[Verifiable Consumer Request Form](#)**
- **Call the WM Privacy team at (617) 982-6699**

For all requests, please clearly state that the request is related to “Your Privacy Rights,” indicate which type of request you are making, and provide your name, street address, city, state, zip code and an e-mail address or phone number where we may contact you. We are not responsible for notices that are not labeled or sent properly or that do not include complete information.

To appeal a decision regarding a consumer rights request, please submit your appeal using one of the three methods above. Your appeal should include an explanation of the reason you disagree with our decision. Within 60 days of receipt of an 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.

Only you, or a person registered with the applicable Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to personal information about you. You may also make a verifiable consumer request on behalf of your minor child.

You may only make such a request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, and describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response electronically. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide the personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

6.3 Opt-out Preference Signals

Our website honors General Privacy Control ("GPC") opt-out preference signals when such signals are configured through your browser. For more information on GPC opt-out preference signals please visit: <https://globalprivacycontrol.org/>.

6.4 California Shine the Light Law

California Civil Code Section 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed personal information (if any) for direct marketing purposes in the preceding calendar year. If you are a California resident and you wish to make such a request, please send an e-mail with "California Privacy Rights" in the subject line to privacy@williamsmarston.com or write us at: WilliamsMarston LLC, Attn: Privacy Inquiries, One Washington Mall, 9th Floor, Boston, MA 02108.

6. WHAT IF I ACCESS A THIRD-PARTY SITE THROUGH THE WEBSITE?

The website may contain links to or from third party sites. Please be aware that we are not responsible for the privacy practices of such third parties. This Notice applies only to the personal information we collect as described above. We encourage you to read the privacy policies of third-party sites you access from links on the website or otherwise visit.

7. HOW DO I STOP RECEIVING MARKETING COMMUNICATIONS?

We will only send you marketing communications if you have agreed to this, or if we are otherwise permitted by law. If at any time you decide that you no longer wish to receive marketing communications from us, you may opt out by clicking on the relevant 'unsubscribe' link in the emails you receive or by contacting us using the details found in the section "How Do I Contact WilliamsMarston."

Please note, while we will honor your request to stop receiving marketing communications, we will continue to send you service-related communications such as emails confirming purchases through the website.

8. DOES WILLIAMSMARSTON TRANSFER MY PERSONAL INFORMATION TO OTHER COUNTRIES?

In order to provide our services, we may need to transfer and process personal information about you internationally (including to destinations outside the country in which you are located).

As a result, information about you may be transferred to and/or processed in countries which may not guarantee the same level of protection for personal information as the country in which you reside. However, we have taken appropriate safeguards to ensure that personal information about you will remain protected in accordance with this Notice.

Further information can be provided on request: please contact us using the details found in the section “How Do I Contact WilliamsMarston?” We have also implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

9. IS MY PERSONAL INFORMATION SECURE?

WilliamsMarston takes precautions intended to help protect information that we process but no system or electronic data transmission is completely secure. Any transmission of personal information is at your own risk, and we expect that you will use appropriate security measures to protect personal information.

You are responsible for maintaining the security of your account credentials for the Services. WilliamsMarston will treat access to the Services through your account credentials as authorized by you. Unauthorized access to password-protected or secure areas is prohibited and may lead to criminal prosecution. We may suspend your use of all or part of the Services without notice if we suspect or detect any breach of security. If you believe that information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

If we become aware of a breach that affects the security of personal information, we will provide you with notice as required by applicable law. To the extent permitted by applicable law, WilliamsMarston will provide any such notice that WilliamsMarston must provide to you under applicable law at your account’s email address. By using the Services, you agree to accept notice electronically.

10. HOW OLD DO I HAVE TO BE TO USE THE WILLIAMSMARSTON SITES OR OTHER DIGITAL OFFERINGS?

The Services are not directed to or intended for use by individuals under the legal age of majority in the individual’s country of residence (“minors”). Consistent with the requirements of applicable law, if we learn that we have received any information directly from a minor without his or her parent’s verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the minor that he or she cannot use the Services and subsequently will delete that information.

California Minors: If you are a California resident who is under the age of 18 and you are unable to remove publicly-available content that you have submitted to us, you may request removal by contacting us at: privacy@williamsmarston.com. When requesting removal, you must be specific about the information you want removed and provide us with specific information, such as the URL for each page where the information was entered, so that we can find it. We are not required to remove any content or information that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you don’t follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the content or information. Removal of your content or information from the Service does not ensure complete or comprehensive removal of that content or information from our systems or the systems of our service providers. We are not required to delete the content or information posted by you; our obligations under California law are satisfied so long as we anonymize the content or information or render it invisible to other users and the public.

11. DOES THIS NOTICE EVER CHANGE?

We may update or modify this Notice from time to time in response to changing legal, technical, or business developments. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws. The date of the most recent version of this Notice will appear at the top of the page.

When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. For example, we will notify you of any changes to this Notice by posting a new Notice and updating the “last modified” date at the top of this page or by sending the new Notice to you via email, where appropriate.

12. HOW DO I CONTACT WILLIAMSMARSTON?

We have taken great measures to ensure that your visit to the website is an excellent one and that your privacy is respected. If you have any questions, comments, or concerns about our privacy practices and/or would like to submit a privacy request, please contact us either:

- Via email at privacy@williamsmarston.com and/or
- Via postal mail at: WilliamsMarston LLC, Attn: Privacy Inquiries, One Washington Mall, 9th Floor, Boston, MA 02108.