

JACKSON RIVER – EU/UK/SWITZERLAND SUPPLEMENTAL PRIVACY NOTICE

Effective Date: January 1, 2023

This EU/UK/Switzerland Supplemental Privacy Notice (“**Privacy Notice**”) describes how Jackson River, LLC and its affiliates and subsidiaries (“**Company**,” “**we**,” “**us**” and “**our**”) collects and processes “personal data” as defined by Regulation (EU) 2016/679 (“**GDPR**”), any national law of an EU member state adopted pursuant to the GDPR, the United Kingdom Data Protection Act of 2018, and the Switzerland Federal Act on Data Protection (collectively, “**Data Protection Laws**”), including through your visits to all of the websites and mobile applications we operate (collectively, the “**Site**”), our legal basis for processing personal data, and certain rights you may have under Data Protection Laws relating to your personal data. This Privacy Notice supplements our Website Privacy Policy, located at <https://www.jacksonriver.com/privacy> (“**Website Privacy Policy**”) and applies to our processing of personal data of individuals in the European Economic Area, the United Kingdom, and Switzerland.

1. DATA CONTROLLER

With respect to “personal data” as defined by Data Protection Laws, the responsible controller is Company.

Please note that we also act as processors for our customers and maintain, store and/or process the personal data of our customer’s constituents and clients on our customers’ behalf when our customers use our Services. Such information is not subject to this Privacy Notice and is instead subject to the privacy policies of our customers.

2. CONTACT DETAILS:

All privacy related inquiries should be directed to legal@togetherwork.com.

3. PROCESSING OF PERSONAL DATA

We collect personal data when you visit and use our websites and mobile applications (collectively, the “**Site**”), as well as when you purchase and/or use our products (the “**Services**”). We may collect the following types of information and process and share such information to provide the Site and the Services to you. We may also process and share such information in the following ways:

Categories of Personal Data Collected	Purposes of Processing	Legal Basis for Processing	Categories of Recipients
First name, last name, address, email address, phone number, organization/company name,	<ul style="list-style-type: none">to provide the Site to you and to improve the Site;to provide, operate, improve, and personalize our Services, and to give each user a more consistent and	<ul style="list-style-type: none">Performance of Contract. We may use your information to perform our contractual services or prior to	<ul style="list-style-type: none">With Third Party Service Providers Performing Services on Our Behalf. We may share your personal

<p>organization/company website</p>	<p>personalized experience when interacting with us;</p> <ul style="list-style-type: none"> • to register your account; • to determine trends in consumption of our Services and determine where our Services may be in demand; • to provide you with information about our Services that we think may be of interest to you; • to provide you with updates about our Services and with transactional information; • for customer service and/or support, security (including for authentication purposes), to detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Site; • for analytics purposes; • to fulfil your requests, such as those related to ordering and payment; • to communicate with you, including through any chat function on the Site; • to enforce our Privacy Policy or other applicable policies; • to comply with applicable laws or respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process; • to enforce our rights, protect our property or protect the rights, property or safety of others; • as needed to support external auditing, compliance and corporate governance functions. 	<p>entering into an agreement with you. If you use the Site or if you contact us to request the Services, we use your information to provide to you the features and functionality of the Site and the Services, including for customer service.</p> <ul style="list-style-type: none"> • Legitimate Interest. We may use information for our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms. For instance, we may use your personal data to contact you and respond to your requests and inquiries, to administer our business including by creating statistical analyses, to identify prevent and detect fraud or to pursue or defend ourselves against legal claims. • Consent. We may use your information with your consent. In these instances, we will ask you to grant us consent to use your information. You are free to grant or deny permission. If you deny permission, we will not be able to process your information to conduct the activity to which the consent relates. For example, we will not be able to send you marketing materials that you request. You are also free to withdraw your consent at any time. A withdrawal of consent will not effect processing that has been completed during the time in which the consent was valid. If 	<p>information with our service providers to perform the functions for which we engage them. For example, we may use third parties to host the Site or assist us in providing functionality on the Site, provide analytics on the Site, provide a chat function on the Site, provide marketing and advertising services for us, to send out emails on our behalf or process payments.</p> <ul style="list-style-type: none"> • With our Affiliates and Subsidiaries. We may share your information with our family of brands and corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures or companies under common control) for our internal business purposes. However, if we do so, their use and disclosure of your personal data will be subject to this Privacy Notice.
<p>E-mail address</p>	<ul style="list-style-type: none"> • to provide you with information about our Services that we think may be of interest to you; • to provide you with updates about our Services and with transactional information; • for customer service and/or support, security (including for authentication purposes), to detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Site; • to communicate with you; • to enforce our Website Privacy Policy, this Privacy Notice or other applicable policies; • to comply with applicable laws or respond to a subpoena, regulation, 	<p>information with our service providers to perform the functions for which we engage them. For example, we may use third parties to host the Site or assist us in providing functionality on the Site, provide analytics on the Site, provide a chat function on the Site, provide marketing and advertising services for us, to send out emails on our behalf or process payments.</p> <ul style="list-style-type: none"> • With our Affiliates and Subsidiaries. We may share your information with our family of brands and corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures or companies under common control) for our internal business purposes. However, if we do so, their use and disclosure of your personal data will be subject to this Privacy Notice. • For Legal Purposes. We also may share information that we collect from users as needed to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose personal data as we deem necessary to respond to a subpoena, regulation, binding 	<p>information with our service providers to perform the functions for which we engage them. For example, we may use third parties to host the Site or assist us in providing functionality on the Site, provide analytics on the Site, provide a chat function on the Site, provide marketing and advertising services for us, to send out emails on our behalf or process payments.</p> <ul style="list-style-type: none"> • With our Affiliates and Subsidiaries. We may share your information with our family of brands and corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures or companies under common control) for our internal business purposes. However, if we do so, their use and disclosure of your personal data will be subject to this Privacy Notice. • For Legal Purposes. We also may share information that we collect from users as needed to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose personal data as we deem necessary to respond to a subpoena, regulation, binding

	<p>binding order of a data protection agency, legal process, governmental request or other legal or regulatory process;</p> <ul style="list-style-type: none"> to enforce our rights, protect our property or protect the rights, property or safety of others; as needed to support external auditing, compliance and corporate governance functions. 		<p>order of a data protection agency, legal process, governmental request or other legal or regulatory process. We may also share personal data as required to pursue available remedies or limit damages we may sustain.</p>
<p>First name, last name, e-mail address, phone number, financial information</p>	<ul style="list-style-type: none"> to fulfil your requests, such as those related to ordering and payment; for customer service and/or support, security (including for authentication purposes), to detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Site; to fulfil your requests, such as those related to ordering and payment; to communicate with you, including through any chat function on the Site; to enforce our Website Privacy Policy, this Privacy Notice or other applicable policies; to comply with applicable laws or respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process; to enforce our rights, protect our property or protect the rights, property or safety of others; as needed to support external auditing, compliance and corporate governance functions. 	<p>you have granted us consent to use your information, we will use it only for the purposes specified when we request your consent. This includes use for our marketing campaigns. By providing your phone number and clicking submit online, you agree to our Website Privacy Policy and this Privacy Notice and authorize us to make or initiate sales calls, text messages and prerecorded voicemails to that phone number using an automated system. Your agreement is not a condition of purchasing any products, goods or services and you may elect to do business with us over the phone. Message & data rates may apply. You may opt out of receiving promotional e-mails and text messages from us by following the unsubscribe instructions provided in any such messages. Please note that if you opt out of receiving promotional messages from us, this does not impact other transactional and administrative messages which you will continue to receive (such as emails relating to billing and payment information or changes to this Privacy Notice). If you have registered for an account with us, you may delete the account at any time by contacting us at legal@togetherworkcom.</p>	<ul style="list-style-type: none"> Corporate Changes. We reserve the right to transfer or assign the information that we have collected from users in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.
<p>Account credentials (i.e., username and password)</p>	<ul style="list-style-type: none"> to provide, operate, improve, and personalize our Services, and to give each user a more consistent and personalized experience when interacting with us; to register your account; to provide you with updates about our Services and with transactional information; for customer service and/or support, security (including for authentication purposes), to detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Site; to fulfil your requests, such as those related to ordering and payment; 	<ul style="list-style-type: none"> Fulfillment of Legal Obligations. We may use 	

	<ul style="list-style-type: none"> • to communicate with you, including through any chat function on the Site; • to enforce our Website Privacy Policy, this Privacy Notice or other applicable policies; • to comply with applicable laws or respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process; • to enforce our rights, protect our property or protect the rights, property or safety of others; • as needed to support external auditing, compliance and corporate governance functions. 	<p>your information to comply with our legal obligations. To comply with regulations, laws or any authority requests, we may disclose your information to authorities or other officials or otherwise process your information pursuant to legal obligations we are subject to (e.g., retain certain information according to tax or commercial laws, respond to your requests to exercise your rights under Data Protection Laws).</p>	
<p>IP address, unique device identifier</p>	<ul style="list-style-type: none"> • to provide the Site to you and to improve the Site; 		
<p>Cookie information, including but not limited to browser type, type of operating system, device type, access times and dates, geographic location, referring website addresses, internet service provider, browsing history, search queries, other technical information such as protocol status and substatus, bytes sent and received, and server information</p>	<ul style="list-style-type: none"> • to give each user a more consistent and personalized experience when interacting with us; • to determine trends in consumption of our Services and determine where our Services may be in demand; • for security and to detect fraud or illegal activities and for archival and backup purposes in connection with the provision of the Site; • to help us understand how visitors interact with the Site and analyze technical and navigational information about the Site; • to help deliver advertisements that are relevant to you and your interests and measure the effectiveness of our advertising campaigns; • for analytics purposes; • to enforce our Website Privacy Policy, this Privacy Notice or other applicable policies; • to comply with applicable laws or respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process; • to enforce our rights, protect our property or protect the rights, property or safety of others; • as needed to support external auditing, compliance and corporate governance functions. 		

4. Cookies and Other Information Collection Tools

As discussed in our Website Privacy Policy, we may use cookies on our Site to enhance user experience on, and improve, our Site, to analyze usage information relating to our Site, and for digital advertising purposes. For a complete list of the cookies we use, please visit our Website Privacy Policy. We use Google Analytics to help analyze how users use the Site and to optimize the Site experience. If you would like to opt-out from the use of your information by Google Analytics, you may use [Google Analytics opt-out browser add-on](#) designed for this purpose.

We will request consent in compliance with applicable law to use certain types of cookies when you visit our Site. You may also manage your cookie preferences through our cookie preference tool available here. Although users are not required to accept cookies or mobile device identifiers, blocking or rejecting them may prevent access to some features available through the Site.

5. CROSS-BORDER TRANSFERS

All personal data we collect through the Site is currently processed in the United States by us or by a party acting on our behalf. When you provide personal data to us through the Site, you consent to the transfer of your data to, and processing of your data in, the United States. The Site is currently hosted in the United States. We will transfer your personal data to the United States through the use of appropriate safeguards as required by Data Protection Laws.

6. RETENTION

We will retain your information for as long as necessary to fulfill the purpose for which it was collected, or as required by applicable laws or regulation.

7. DATA SUBJECT RIGHTS

Under Data Protection Laws, you have the following privacy rights, which you may exercise by contacting us at legal@togetherwork.com with “GDPR Request” on the subject line and in the body of your message. If you are a constituent or client of one of our customers, please submit your requests to exercise your rights directly to such customer.

- **Right of Access.** You have the right to obtain confirmation as to whether your personal data is being processed, as well as access to the personal data along with certain information, including the purposes of the processing, the categories of personal data concerned and the recipients or categories of recipients to whom the personal data have been or will be disclosed.
- **Right to Rectification.** You have the right to rectify your inaccurate personal data and to complete any incomplete personal data, including by means of providing a supplementary statement.
- **Right to Erasure or Right to be Forgotten.** You have the right to erase your personal data under certain circumstances.

- **Right to Restrict Processing.** You have the right to restrict our processing of your personal data under certain circumstances.
- **Right to Object.** You have right to object, on grounds relating to your particular situation, at any time to our processing of your personal data, which is based on public interest or our legitimate interests, including the profiling of data. In this case, we will stop processing your data, except for where we have compelling legal grounds for the processing which override your interests, rights and freedoms, or for the exercise or defence of possible legal claims. You also have a right to object to the processing of your personal data for direct marketing purposes.
- **Right to Data Portability.** Under certain circumstances, you have the right to receive your personal data that you provided to us in a structured, commonly used and machine-readable format, and have the right to transmit such data to another controller without hindrance from us.
- **Right to Withdraw Consent.** If you have provided us with your consent for the processing of your personal data, you may withdraw your consent at any time to stop any further processing.
- **Right to Lodge a Complaint.** You have a right to lodge a complaint with a supervisory authority if you believe that our processing of your personal data violates the Data Protection Laws.

8. DATA SECURITY

We employ technical and organizational security measures designed to protect the security of information submitted through the Site and/or the Services. However, the security of information transmitted through the Internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the Internet or for changes to or losses of data. Users of the Site are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our Site. In order to protect us, you and your data, we may suspend your use of the Site, without notice if any breach of security is suspected. Access to and use of password protected and/or secure areas of the Site are restricted to authorized users only. Unauthorized access to such areas is prohibited.

9. LINKS TO OTHER WEBSITES AND ONLINE SERVICES

The Site may contain links and widgets related to third-party websites and online services, such as social networks (a “**Third-Party Service**”), with which we have no affiliation. A link to or other availability of any Third-Party Service does not mean that we endorse it, or the quality or accuracy of information presented on it. If you decide to visit a Third-Party Service, you are subject to the privacy notices and practices of the third party that operates the Third-Party Service and not this Privacy Notice. We encourage you to carefully review the legal and privacy notices of all other digital services that you visit.

10. EFFECTIVE DATE AND CHANGES TO PRIVACY NOTICE

The Effective Date of this Privacy Notice is set forth at the top of this webpage. We may change this Privacy Notice from time to time in our discretion. Such changes to the Privacy Notice may be required to reflect enhancements to our Site and may therefore affect the collection, retention and use of personal data. Changes will be posted to this webpage. We encourage you to return to this webpage frequently so that you are aware of our current privacy practices. The amended Privacy Notice supersedes all previous versions.