VelocityEHS Privacy Policy and Notice at Collection

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VelocityEHS Holdings Inc., on behalf of itself and its Affiliates, ("**VelocityEHS**," "**we**," "**us**," or "**our**") is committed to privacy and data protection. This Privacy Policy and Notice at Collection ("**Notice**") applies to information that VelocityEHS Holdings Inc. collects on the VelocityEHS website, https://www.ehs.com/, through the VelocityEHS software applications, products, and services, and any other website or services authorized by VelocityEHS 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 VelocityEHS collects from you and how VelocityEHS 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). You may download a copy of this Notice here.

Where you provide personal information through our platform solutions, such as the Accelerate Platform, VelocityEHS shall process this information as a data processor on behalf of your employer or business (our "**Customer**"). Where VelocityEHS uses such personal information for marketing or business purposes (e.g., metrics), VelocityEHS shall be considered the data controller. Additionally, VelocityEHS is the controller of the personal information we collect through the ehs.com website. Any questions or concerns regarding VelocityEHS's privacy and data protection practices can be directed to our Data Protection Lead at privacy@ehs.com.

NOTICE AT COLLECTION

1. WHAT INFORMATION DOES VELOCITYEHS 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 from which we collect information, and the business or commercial purposes use of personal information about you.

When you visit and use our Services we may collect the following categories of personal information:

- *Identifiers*. Such as a real name, alias, postal address, telephone number, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- *Financial information*. Such as your payment card number, credit score, billing address, and related financial information.
- *Your opinions or other information*. For example, if you review the products you have purchased from us or provide information about products, and the brands you use.
- *Commercial information*. Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- *Online Communications*. Information derived from your business-related requests, communications, emails, chat conversations, and dealings we have with you, or the organization you work for or are associated with.

- *Geolocation Data*. Such as physical location. We do not collect precise geolocation data from you or your device, but may collect and use information about your general location (such as any state or country of residence supplied by you when setting up your user profile) or infer your approximate location based on your IP address in order to track our general website usage or to tailor any pertinent aspects of your user or educational experience to your region.
- *Internet or other similar network activity*. Such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. 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. This includes behavioral data such as mouse movements, cursor position, hover interactions, click patterns, scroll depth, keystroke dynamics, form field interactions, and session duration.
- *Inferences drawn from other personal information*. Such as a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- *Professional or employment-related information*. Such as current or past job history or performance evaluations.
- *Protected Classification characteristics*. Such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information). Some of this information may be considered Sensitive personal information.

Sources of Personal Information

We collect personal information from the following sources:

- **Directly from you** when you provide it through forms, account creation, purchases, or communications
- **Automatically through tracking technologies** when you visit our Services (see Section 6 "Cookies Policy & Similar Technologies" for details)
- **Third-party data providers and enrichment services** including Dun & Bradstreet ("**D&B**"), ZoomInfo, 6Sense Insights Inc., G2, Marketo, and LiveRamp, which provide business intelligence and data enrichment based on your IP address, company information, and professional profile
- **Marketing and advertising partners** that provide demographic and interest data
- **Social media platforms** when you interact with our content or link your accounts
- **Business partners and affiliates** that share information in connection with joint services

We may use these categories of personal information for the following purposes:

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.

Customers may use our tools to schedule, manage and track workplace incidents and formal safety meetings and to ensure compliance with state and federal safety regulations and this may provide VelocityEHS with human resource-related data such as date of birth, age, gender, job title and work history. Also, customers using our tracking and streamline tools to submit regulatory reports may provide VelocityEHS with more sensitive information such as medical records, medical bills and doctors' notes (please note this sensitive data is collected only by our business unit located in Oakville, Canada).

If you provide personal information to our SDS/Chemical Management (U.S.) product, VelocityEHS shall process this information as a data processor on behalf of its customers, who use our Services to assist with their chemical management processes. The personal information includes name, email address and location. Unless VelocityEHS uses some of this information for marketing or business purposes (e.g. metrics), in such case, VelocityEHS shall be considered the data controller.

The VelocityEHS may also collect, from you, the following personal information about your contacts: (a) name and email address, in order to forward a job posting, refer our products or services, share an article, blog post or other content or (b) through our "import contacts" feature we may collect the name, email address, phone number of your contacts in order to provide description of use/purpose of collection e.g. to connect you with people you know who also use our Service. When you provide us with personal information about your contacts, we will only use this information for the specific reason for which it is provided.

To provide you with products and services we may collect: *Identifiers, your opinions or other information, Protected classification characteristics, Commercial information, Online Communication, Geolocation data, Inferences drawn from other personal information, and Internet or other similar network activity*

To provide you with mobile applications

When you download and use our mobile application, we automatically collect information on the type of Device you use and the operating system version.

VelocityEHS sends you push notifications from time to time to update you about any events or promotions that we may be running. If you no longer wish to receive these types of communications, you may turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your Device such as operating system and user identification information. We do not ask for, access or track any location-based information from your mobile Device at any time while downloading or using our mobile application.

VelocityEHS uses mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.

To provide you with mobile applications we may collect: *Identifiers, and Internet or other similar network activity.*

To process your payments

After you place an order on our website you will need to make payment for the goods or services you have ordered. Your payment may be processed by Stripe, Inc. or other payment processors (the "**Payment Processors**"). The Payment Processors collect, use and process information about you, including payment information, in accordance with their privacy policies. Information you provide to the Payment Processors may be used for payment transaction processing and fraud prevention.

To process payments, we may collect and process: *Identifiers, Financial information, and Commercial information*

In connection with artificial intelligence

We may use artificial intelligence technology to process personal information in connection with the performance of our services, communications, and/or through the chat feature on our website. We may use anonymized and aggregated data to train, retrain, tune, validate, modify, update or otherwise improve any such artificial intelligence technology.

In connection with artificial intelligence, we may collect and process: *Identifiers, Commercial Information, Online Communications, Internet or other similar network activity, and Geolocation data.*

To enable you to search our website

We collect and process personal information to enable you to use the website search functionality and to return relevant results based on your queries. This may include identifiers such as IP address, device information, and search terms entered on our site. We use this information to improve search accuracy, maintain system performance, and monitor usage trends.

When you use the search feature, we may share the data your enter with third-party service providers that support our website functionality, analytics, and performance monitoring, and as further described in Section 2 of this Privacy Notice.

In connection with artificial intelligence, we may collect and process: Identifiers; Internet or other network activity (e.g., search queries, interaction logs); and Geolocation data.

For tailored advertising

In order to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you, we, or with third-party vendors, may use your personal information to provide you with tailored advertising on third-party websites, including social networking sites and other websites or services with user-generated content features such as Facebook and Instagram. These advertisements are either: (i) "contextual" (meaning they are presented due to the webpage that you are viewing); or (ii) "behavioral advertising" or "interest-based advertising" (i.e., where advertisements are shown to you based upon your interests which we have inferred from your information including demographic, geographic, and interest-based data). We may use tailored advertising to specifically include or exclude individuals who have registered for our products to ensure that you are provided with information about those products that are most relevant to you. To do this, we may track your browsing activity across different websites, different Devices and/or different applications. We may match your browsing activity on one Device, such as your mobile phone, with your browsing activity on another Device, such as your tablet, to ensure our advertising is tailored to you. If you no longer wish to see tailored advertising, you can manage your cookie preferences and choose to opt out of those cookies by clicking "Cookie Preferences" in the footer of our website. In addition, some third-party sites allow you to stop seeing advertisements from specific advertisers on that site, so you should also check your preferences on those websites. For more information on how VelocityEHS uses cookies please review our Cookie Policy.

Cross-Context Behavioral Advertising and Cross-Domain Tracking

We track your activity across multiple VelocityEHS websites and subdomains, including ehs.com, velocityehs.com, and related properties operated through different content management systems including Marketo, Webflow, G2, and WordPress. We use cookie synchronization, consistent identifiers, and unique URL parameters to connect your activity across these properties and across different devices.

This cross-domain tracking allows us to build a profile of your interests and deliver coordinated advertising experiences. In some jurisdictions you have the right to opt out of this cross-context behavioral advertising.

To provide tailored advertising we may collect and process: *Identifiers, Customer records, Protected classification characteristics, Commercial information, Internet or other similar network activity, Geolocation data*

You can also learn more about our current advertisers and review your opt-out options on their websites:

Google: https://adssettings.google.com/authenticated?hl=en

AdRoll: https://app.adroll.com/optout/

If you would like more information about advertisers' practices, please see http://optout.aboutads.info/#!/. You can generally opt-out of receiving personalized ads from third-party advertisers and ad networks who are members of the Network Advertising Initiative ("**NAI**") or who follow the Digital Advertising Alliance's ("**DAA**") Self-Regulatory Principles for Online Behavioral Advertising by visiting the opt-out pages on the NAI website (http://optout.networkadvertising.org) and DAA website (http://www.aboutads.info/choices/).

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.

For analytics purposes we may collect: *Internet and network information*

For profiling and business intelligence

We engage in profiling by combining your behavioral data (including pages visited, content viewed, time spent, and interaction patterns), IP address, device information, and other identifiers to create a profile of your company, professional role, industry, and business interests. We share your IP address and behavioral signals with business intelligence platforms including 6Sense Insights Inc., ZoomInfo, and Dun & Bradstreet ("**D&B**") to identify your company, match your activity to existing business contacts in our database, and enrich our understanding of your professional profile and purchasing intent. This profiling is used to:

Determine what advertising and content to show you; Identify high-value business prospects; Prioritize sales and marketing outreach; Personalize your website experience; and Share audience segments with advertising platforms for targeted advertising.

Form submissions may be sent to D&B in real-time as you populate form fields to enrich the data with additional company and contact information. You have the right to object to profiling under applicable privacy laws including GDPR Article 21 and similar US state privacy law provisions.

For profiling and business intelligence we may collect and process: Identifiers, Professional or employment-related information, Internet or other similar network activity, Geolocation data, Commercial information, Inferences drawn from other personal information

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*.

For business, product and service development, diagnostics, optimization and management

For example we may use personal information about you provided to us to:

- Administer the website;
- Ensure the security of our networks and of information;
- Customize your future visits to the website based on your interests to ensure the most user-friendly online navigation experience;
- Improve the website and our other digital offerings (including to fix operational problems such as pages crashing and software bugs); and
- Provide services to our partners such as tools, analyses, data and insights to see how their website or mobile applications are used.

To support site optimization and management we may collect and process: *Internet and network information,*

For fraud prevention and detection purposes and to protect and defend the rights and property of VelocityEHS, our employees and business partners

For fraud prevention and detection purposes, we may use any information we collect to protect and defend the rights and property of VelocityEHS, our employees, and business partners.

To support fraud prevention and detection purposes and to protect and defend the rights and property of VelocityEHS, our employees and business partners, we may collect: *Identifiers or Internet or other similar network activity*.

For Job or Internship Applications

If you contact us in relation to your employment prospects, we will use personal information to consider you for current and future employment opportunities and to contact you with respect to employment opportunities at VelocityEHS in which you have expressed an interest.

To support employment consideration, we may collect and process: *Identifiers and Professional or employment-related information*.

By selecting the "Click here to apply" link on the open positions page, you will be directed to a third-party recruitment services website, currently ultipro.com ("**Recruitment Provider**"). Your use of the Recruitment Provider's services is governed by the Recruitment Provider terms of service and privacy policy available through the Recruitment Provider's website.

To verify your identity

For example, we may use your email address to determine if you already have an account with us.

Information We Collect Automatically

When you interact with VelocityEHS, we may use cookies and similar tracking technologies to automatically gather certain information about you. For more details, please refer to the Section titled "Cookies and Information Collection Technology (Cookies Policy)."

- Internet or Other Electronic Network Activity Information: This includes your browsing history, search history, and interactions with our website, applications, or advertisements. For example, when you visit our services or engage with VelocityEHS content, we may collect data from your device, such as your IP address, device type (make and model), unique device identifiers, browser type, and time zone settings. We also track how your device interacts with us, including pages accessed, links clicked, navigation patterns, preferences, products or services viewed or searched for, and any crashes or download errors.
- Geolocation Data: We collect your IP address to infer your general location, such as city or postal code. For instance, when you visit our services, we may determine your broad geographic location (e.g., country or city level) from your device.
- Inferences from Other Personal Information: We may draw inferences to create a profile reflecting your preferences, characteristics, behavior, and attitudes. For example, we use the personal information mentioned above to offer you tailored advertising, content, and products that we believe you may find interesting. More details are available in the Section titled "How does VelocityEHS use my personal information?"

Linking information

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 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 fulfil 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 it was collected, 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.

If personal data covered by this Privacy Policy is to be used for a new purpose that is materially different from that which the personal data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party in a manner not specified in this Policy, VelocityEHS will provide you with an opportunity to choose whether to have your personal data so used or disclosed. Requests to opt-out of such uses or disclosures of personal data should be sent to us as specified in Section 15 -- How Do I Contact VelocityEHS below.

Certain personal data, such as information about medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, is considered "Sensitive Information" and not expected to be processed in connection with this Policy. To the extent that Sensitive Information may be processed, VelocityEHS will not use Sensitive Information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual unless VelocityEHS has received your affirmative and explicit consent (opt-in).

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.

1A. VELOCITYEHS MARKETING CHATBOT

This Section applies when you use an AI-enabled chatbot provided through a VelocityEHS website, product, or service. VelocityEHS Holdings Inc., on behalf of itself and its affiliates, is referred to as "VelocityEHS", "we", "us" or "our".

1A.1 AI Disclosure

The chatbot is an artificial intelligence ("**AI**") system, not a human. It generates automated responses from the information submitted to it. *Where available, you may request assistance from a person.*

1A.2 Information and Purposes

We process the content you submit, the chatbot's responses, relevant account or contact information and limited technical and security logs. We use this information only as necessary to respond to your request, provide or support the service, refer the matter to a person, maintain security, prevent misuse and meet legal obligations.

1A.3 Our Role and Lawful Basis

VelocityEHS is the controller when the chatbot is provided for our own purposes and relies, as applicable, on contract, legitimate interests in providing and securing the service, or legal obligation. *Within a customer's use of a VelocityEHS product, the customer is normally the controller and VelocityEHS processes information on its documented instructions. Continued use is not consent to unrelated or optional uses.*

1A.4 No Identifiable Data Used for AI Training

VelocityEHS does not use identifiable chatbot data to train AI systems. Only anonymized or aggregated information that can no longer reasonably be linked to an individual may be used to improve AI technology.

1A.5 Sharing, Transfers, and Retention

Information may be shared with the relevant customer and approved AI, hosting, security, or support providers where necessary to operate the chatbot, subject to appropriate contractual and security requirements. We retain identifiable information only as long as necessary for its purpose or applicable legal requirements.

1A.6 Sensitive Information and Automated Decisions

Do not submit sensitive or confidential information. VelocityEHS does not use the chatbot to make solely automated decisions producing legal or similarly significant effects *unless that use is separately disclosed and legally authorized.*

1A.7 Your Rights and Contact

Your applicable rights, how to exercise them, and how to contact the VelocityEHS Data Protection Lead are explained in the VelocityEHS Privacy Policy. Where VelocityEHS acts for a customer, privacy requests should normally be directed to that customer as controller.

2. DO WE SELL OR SHARE PERSONAL INFORMATION?

We may disclose personal information about you to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed categories of third parties indicated in the chart below.

We may sell to, or share personal information about you with third parties, subject to your right to opt-out of those sales. Our personal information sales do not include information about individuals we know are under age 16. In the preceding twelve (12) months, VelocityEHS has sold the following categories of personal information to the categories of third parties indicated in the chart below. To opt-out of personal information sales or sharing, click "Cookie Preferences" in the footer of our website and adjust your tracking preferences.

NOTICE TO TEXAS RESIDENTS: We may sell your sensitive personal data. You have the right to opt out of the sale of your sensitive personal data.

Personal Information Category	**Business Purpose Disclosures**	**Third-Party Sales or Sharing**
Identifiers	Payment processing, marketing, delivery services, customer relationship management, website search, web hosting, or data storage	Payment Processors, Ad Networks, Sales/Marketing tools, website search, hosting service providers, data analytics providers
Customer records	Marketing, customer relationship management, or data storage	Ad Networks, Sales/Marketing tools, data analytics providers
Protected classification characteristics and sensitive	Marketing, customer relationship management, or data storage	Ad Networks, Sales/Marketing tools, data analytics providers

Personal Information Category	Business Purpose Disclosures	Third-Party Sales or Sharing
personal information		
Commercial Information Communications	Payment Processing, Customer relationship management, or data storage	Payment Processors, Sales/Marketing tools, data analytics providers
Identifiers	Payment processing, marketing, delivery services, customer relationship management, web hosting, or data storage	Payment Processors, Ad Networks, Sales/Marketing tools, hosting service providers, data analytics providers
Internet or other similar network activity	Marketing, delivery services, customer relationship management, website search, web hosting, or data storage	Remarketing, retargeting, and advertising providers
Geolocation information	Marketing, customer relationship management, web hosting, or data storage	Remarketing, retargeting, and advertising providers
Professional or employment-related information	Marketing, customer relationship management, or data storage	Remarketing, retargeting, and advertising providers
Inferences drawn from other personal information	Marketing, customer relationship management, or data storage	Remarketing, retargeting, and advertising providers

3. HOW LONG DOES VELOCITYEHS 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 VelocityEHS 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.

We retain consent records for a minimum of five (5) years from the date consent is provided or withdrawn to enable us to demonstrate compliance with applicable privacy laws.

4. FOR WHAT BUSINESS PURPOSE CAN VELOCITYEHS USE MY PERSONAL INFORMATION IN THIS WAY?

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 fulfil 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 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 below in Section 15 "How do I contact VelocityEHS?"

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 fulfil 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 below in Section 15 "How do I contact VelocityEHS?"

5. DOES VELOCITYEHS SHARE MY PERSONAL INFORMATION WITH ANYONE?

In addition to the third parties identified above in Section 2 "Do We Sell or Share Personal Information?", during the past 12 months, we may have disclosed the categories of personal information listed in Section 1 "What Information Does VelocityEHS Collect About Me and Why?" to the following categories of recipients:

In connection with your general use of our Services:

- **With Service Providers, Contractors, and Agents.** We may share personal information with third parties who perform services on our behalf, such as payment processing, data analysis, email and hosting services, customer service and support, fulfillment companies, application development and web hosting companies' information technology and related infrastructure providers, email providers, or audit and professional services providers. These service providers may access personal information about you and are required to use it solely to provide our requested service.
- **Social Media Platforms.** If you link or sign in with your social media accounts through our Services, we may share personal information with those third-party social media sites.
- **With Our Marketing Partners.** We rely on other third parties to help us audit the quality and effectiveness of advertisements, to serve advertisements or marketing material, provide analytic services, and similar services. We may share some of your information with these marketing partners so they can perform these functions.
- **With our Affiliates.** We may make personal information available to VelocityEHS 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.
- **As part of a Business Transfer.** VelocityEHS may disclose personal information 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.** VelocityEHS may disclose personal information 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

- **With Your Permission.** With your consent or at your request, we may share information to third parties outside the scope of this Notice.

In connection with the Contractor Compliance service:

In addition to the recipients listed above, if you use the Contractor Compliance service, we may share information about you with Hiring Organizations and Contractors. The Contractor Compliance service enables you to share personal information with other users of the Contractor Compliance service. For example, Contractors may share personal information with Hiring Organizations, and Hiring Organizations may share personal information with Contractors. Any personal information you share through the Contractor Compliance service can be seen, downloaded, and utilized by the users with which you share the information. We do not control which users you choose to share personal information with, or which users share personal information with you, nor do we assume any responsibility or liability for the personal information, user activities within the Contractor Compliance service or activities of users with which you choose to share personal information. You alone are responsible for the personal information you share through the Contractor Compliance service and for choosing with whom you share personal information.

VelocityEHS may aggregate information collected though the Services and remove identifiers so that the information no longer identifies or can be used to identify an individual ("**Anonymized Information**"). VelocityEHS shares Anonymized Information with third parties and does not limit third parties' use of 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 to offer you an overall better service. We will use this information where you have provided your consent to the third party or to VelocityEHS, or where VelocityEHS has a legitimate interest in using information about you to provide you with the content or service requested. We will combine this information with personal information provided by you, to identify prospective customers or products you'll be interested in, to create more tailored advertising, and to improve the accuracy of our records.

6. COOKIES POLICY & SIMILAR TECHNOLOGIES

How We Use Cookies

We use Cookies to track how you use the Services by providing usage statistics. Cookies are also used to allow product authentication to you based upon your browsing history and previous visits to the Services. Information supplied to us using cookies helps us to provide a better online experience to our visitors and users and send marketing communications to them.

While this information on its own may not constitute "personal data", we may combine the information we collect via Cookies with personal data that we have collected from you to learn more about how you use the Services to improve them.

Tracking Technologies and Methods

In addition to cookies, we use the following tracking technologies and identification methods:

Local Storage: We store data in your browser's local storage to maintain session information and preferences

Device Fingerprinting: We collect and analyze device characteristics (browser type, screen resolution, installed fonts, plugins, operating system) to create a unique identifier for your device

IP Address Tracking: We use your IP address to identify your geographic location and, in combination with business intelligence platforms, to identify your company or organization

Unique URL Parameters: When you click links in emails from our marketing automation platform (Marketo), you may be directed to unique URLs that associate your activity with your email address and profile in our database

Session Recording: We use Hotjar to record your browsing sessions, including mouse movements, clicks, scrolls, form interactions, and page navigation

These technologies allow us to recognize you across different sessions, devices, and websites even without traditional cookies.

Types of Cookies

We use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your Device until you delete them). To make it easier for you to understand why we need them, the Cookies we use on the Services can be grouped into the following categories:

- **Strictly Necessary:** These Cookies are necessary for the Services to work properly. They include any essential authentication and authorization cookies for the Services.
- **Functionality:** These Cookies enable technical performance and allow us to "remember" the choices you make while browsing the Services, including any preferences you set. They also include sign-in and authentication cookies and IDs that enable you to return without additional sign-in.
- **Performance/Analytics:** These Cookies allow us to collect certain information about how you navigate the Services running on your Device. They help us understand which areas you use and what we can do to improve them.
- **Marketing and Customer Support:** These Cookies are used to deliver relevant information related to the Services to an identified machine or other device (not a named or otherwise identifiable person) which has previously been used to visit the Services. Some of these types of Cookies on the Services are operated by third parties with our permission and are used to identify advertising sources that are effectively driving customers to the Services.

Representative List of Tracking Technologies Deployed

Below is a list of tracking and analytics technologies currently deployed on our Services, organized by category:

Analytics & Performance:

- Google Analytics
- New Relic Inc.
- Convert Insights, Inc.
- Pendo

Session Recording & Behavioral Analytics:

- Hotjar (records mouse movements, clicks, scrolls, form interactions)

Advertising & Marketing:

- Google Advertising Products
- Microsoft Advertising
- LinkedIn Ads
- Reddit Ads
- LiveRamp

B2B Intent & Enrichment:

- 6Sense Insights, Inc. (IP-based company identification)
- ZoomInfo (company and contact enrichment)
- Dun & Bradstreet ("**D&B**") (company identification and data enrichment)

Marketing Automation & Customer Engagement:

- Adobe Marketo Engage
- Marketo
- Customer.io
- Gainsight

Infrastructure & Content Delivery:

- Amazon CloudFront
- Cloudflare
- WPEngine (hosting with access and error logs)
- Webflow
- NitroPack

Additional Services:

- accessiBe (accessibility)
- Weglot (translation)
- TrustArc (consent management)
- Zendesk (customer support)
- Vimeo (video hosting)
- Stripe (payment processing)
- jQuery (JavaScript library)
- Adobe Fonts (web fonts)
- Volentio JSD Limited

- Contractor Compliance

For detailed information about each technology including cookie names, durations, and purposes, please see our cookie list.

Cookies Set by Third Party Sites

To enhance our content and to deliver a better online experience for our users, we sometimes embed images and videos from other websites on the Services. We currently, or may in the future, use content from websites such as Facebook, LinkedIn and Twitter. You may be presented with Cookies from these third-party websites. Please note that we do not control these Cookies. The privacy practices of these third parties will be governed by the third parties' own privacy statements or policies. We are not responsible for the security or privacy of any information collected by these third parties, using cookies or other means. You should consult and review the relevant third-party privacy statement or policy for information on how these cookies are used and how you can control them.

We also use Google, a third-party analytics provider, to collect information about Services usage and the users of the Services, including demographic and interest-level information. Google uses cookies to collect demographic and interest-level information and usage information from users that visit the Services, including information about the pages where users enter and exit the Services and what pages users view on the Services, time spent, browser, operating system, and IP address. Cookies allow Google to recognize a user when a user visits the Services and when the user visits other websites. Google uses the information it collects from the Services and other websites to share with us and other website operators' information about users including age range, gender, geographic regions, general interests, and details about devices used to visit websites and purchase items. We do not link information we receive from Google with any personal identifiable information. For more information regarding Google's use of cookies, and collection and use of information, see the Google Privacy Policy (available at https://policies.google.com/privacy?hl=en). If you would like to opt out of Google Analytics tracking, please visit the Google Analytics Opt-out Browser Add-on (available at https://tools.google.com/dlpage/gaoptout).

Other Similar Technologies

VelocityEHS web pages may use other technologies such as web beacons to help deliver cookies on the Services and count users who have visited those websites. We also may include web beacons in our promotional email or newsletters to determine whether you open and act on them as well as for statistical purposes.

In addition to standard cookies and web beacons, the Services can also use other similar technologies to store and read data files on your computer. This is typically done to maintain your preferences or to improve speed and performance by storing certain files locally.

How to Control and Delete Cookies

Cookies can be controlled, blocked or restricted through your web browser settings. Information on how to do this can be found within the Help Section of your browser. All Cookies are browser specific. Therefore, if you use multiple browsers or devices to access websites, you will need to manage your cookie preferences across these environments.

If you are using a mobile device to access the Services, you will need to refer to your instruction manual or other help/settings resource to find out how you can control cookies on your Device.

Please note: If you restrict, disable or block any or all Cookies from your web browser or mobile or other device, the Services may not operate properly, and you may not have access to the Services available

through the Services. VelocityEHS shall not be liable for any impossibility to use the Services or degraded functioning thereof, where such are caused by your settings and choices regarding cookies.

To learn more about cookies and web beacons, visit https://www.allaboutcookies.org.

7. WHAT ARE MY DATA PROTECTION CHOICES AND RIGHTS?

US State consumer privacy laws may provide their residents with rights regarding our use of personal information. The following Section applies to individuals who reside in specific jurisdictions that provide additional privacy rights.

7.1 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 -- To opt-out of personal information sales or sharing click "Cookie Preferences" in the footer of our website and adjust your tracking preferences.

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.

7.2 How to Exercise these Rights

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

- **Email: privacy@EHS.com**
- **Phone: 1-888-362-2007**
- **Verifiable Consumer Request Form**

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 against 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. All the 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.

7.3 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/.

7.4 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@ehs.com or write us at: VelocityEHS Holdings Inc., Attn: Privacy Inquiries, 222 Merchandise Mart Plaza, Suite 1750, Chicago, IL 60654.

7.5 Commitment Regarding De-Identified Data

We commit to maintain and use de-identified information only in de-identified form; not to attempt to re-identify it (except solely to test, analyze, or validate our de-identification methods or as required by law); to implement reasonable safeguards to prevent re-identification; and to require any recipients of de-identified information to do the same. "De-identified" means information that cannot reasonably be used to infer information about, or otherwise be linked to, a particular consumer or household.

8. EU, UK, AND SWISS DATA PROTECTION RIGHTS

VelocityEHS is the controller of the personal information collected through the Services. Any questions or concerns regarding VelocityEHS's privacy and data protection practices can be directed to our Data Protection Lead at privacy@EHS.com.

Residents of the EU, UK and Switzerland may be entitled to other rights under the GDPR. These rights are summarized below. We may require you to verify your identity before we respond to your requests to exercise your rights. If you are entitled to these rights, you may exercise these rights with respect to personal information about you that we collect and store:

- The right to withdraw your consent to data processing at any time (please note that this might prevent you from using certain aspects of the Services);
- The right of access;
- The right to request a copy of personal information about you;
- The right to correct any inaccuracies in personal information about you;
- The right to erase personal information about you;
- The right to data portability, meaning to request a transfer of personal information about you from us to any other person or entity as chosen by you;
- The right to request restriction of the processing of personal information about you; and
- The right to object to processing personal information about you.

You may exercise these rights free of charge. These rights will be exercisable subject to limitations as provided for by the GDPR. Any requests to exercise the above listed rights may be made to: privacy@EHS.com. If you are an EU, UK, or Swiss resident, you have the right to lodge a complaint with a Data Protection Authority about how we process personal information about you at the following website: https://edpb.europa.eu/about-edpb/board/members_en or https://ico.org.uk/.

International Transfers of personal information

Whenever we transfer personal information about you out of the EEA, we ensure a similar degree of protection is afforded to it by using a solution that enables lawful transfer of personal data to a third country in accordance with Article 45 or 46 of the GDPR (including the European Commission Standard Contractual Clauses and the EU-US Data Privacy Framework).

EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework

VelocityEHS, including its Affiliates VelocityEHS Holdings, Inc. and VelocityEHS, Inc., complies with the EU-U.S. Data Privacy Framework ("**EU-U.S. DPF**"), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework ("**Swiss-U.S. DPF**") and to the rights of EU and UK individuals and Swiss individuals as set forth by the U.S. Department of Commerce. VelocityEHS has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles ("**EU-U.S. DPF Principles**") with regard to the processing of personal data received from the European Union in

reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) under the UK Extension to the EU-U.S. DPF. VelocityEHS has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles ("**Swiss-U.S. DPF Principles**") with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework ("**DPF**") program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

VelocityEHS is responsible for the processing of personal data it receives, under the DPF, and subsequently transfers to a third party acting as an agent on its behalf. VelocityEHS complies with the DPF Principles for all onward transfers of personal data from the EU, UK, and Switzerland, including the onward transfer liability provisions.

The Federal Trade Commission has jurisdiction over VelocityEHS's compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF. In certain situations, VelocityEHS may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, VelocityEHS commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities ("**DPAs**") and the UK Information Commissioner's Office ("**ICO**") and the Swiss Federal Data Protection and Information Commissioner ("**FDPIC**") with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

VelocityEHS commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to TRUSTe, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit https://feedback-form.truste.com/watchdog/request for more information or to file a complaint. These dispute resolution services are provided at no cost to you.

For complaints regarding EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF compliance not resolved by any of the other DPF mechanisms, you have the possibility, under certain conditions, to invoke binding arbitration. Further information can be found on the official DPF website located at: https://www.dataprivacyframework.gov/s/.

For additional information on the mechanisms used to protect personal information about you, please contact us at privacy@EHS.com.

To exercise any of your rights under the General Data Protection Regulation as an EU, UK, or Swiss individual please contact us at privacy@EHS.com with the phrase "Data Privacy Rights Request" in the subject line, or complete a **Verifiable Consumer Request Form**.

9. 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.

10. 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 below in Section 15 "How Do I Contact VelocityEHS?"

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.

11. DOES VELOCITYEHS TRANSFER MY PERSONAL INFORMATION TO OTHER COUNTRIES?

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 below in Section 15 "How Do I Contact VelocityEHS?" We have also implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

12. IS MY PERSONAL INFORMATION SECURE?

VelocityEHS 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. VelocityEHS 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, VelocityEHS will provide any such notice that VelocityEHS must provide to you under applicable law at your account's email address. By using the Services, you agree to accept notice electronically.

13. HOW OLD DO I HAVE TO BE TO USE THE VELOCITYEHS 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@ehs.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.

14. 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.

15. HOW DO I CONTACT VELOCITYEHS?

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@ehs.com and/or
- Via toll free telephone at 1-888-362-2007 and/or
- Via postal mail at: VelocityEHS Holdings Inc., Attn: Privacy Inquiries, 222 Merchandise Mart Plaza, Suite 1750, Chicago, IL 60654.