



# PRIVACY POLICY

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**PTW AMERICA, INC.**  
**PRIVACY POLICY**

Last updated: November 20, 2023

Thank you for visiting our “PTW” website at [www.ptw.com](http://www.ptw.com) (the “Website”).

This Privacy Policy is a legal agreement between you and PTW AMERICA, INC., a U.S. corporation (the “Company”) and owner of the website (as defined below). This Privacy Policy is specifically applicable to and governs your use of (a) the Company’s websites, which include <https://www.ptw.com>, along with its associated subdomains (collectively, the “Websites”); (b) the interactive entertainment products and services that the Company publishes and distributes which are subject to this Privacy Policy; and (c) any other features, functionalities, content, marketplace, products, services, technologies, and other content that the Company and other publishers make available or that are otherwise accessible by means of the Websites, or the Websites (clauses (a), (b), and (c) are collectively referred to herein as the “Service”).

The Company respects your privacy and, as importantly, the personally identifiable information and personal data (i.e., information that can be used to identify you, directly or indirectly, including, but not limited to, your name, email address, and certain electronic data of or concerning your computing device, internet connection, browser, etc.) (collectively, “Personal Information”). This Privacy Policy: (a) describes the collection, storage, use, and disclosure of Personal Information that is and that may be collected whenever you visit the Website or access and use the Service; (b) also describes with whom such information may be shared and the measures that the Company takes to protect the security of such information; and (c) is applicable to all visitors to the Website, as well as to all individuals that elect to become customers in connection with services with the Company or any of its subsidiaries, affiliates, and/or business partners.

You must be at least eighteen (18) years of age to use the Service. By accessing the Website, or by formally accepting this Privacy Policy, you represent and warrant to the Company that you are eighteen (18) years of age or older and that you have the right, authority, and legal and mental capacity to accept and to agree to abide by all of the terms and conditions set forth in this Privacy Policy, and, in such, event, this Privacy Policy constitutes a legal agreement between you and the Company. If you are below the age of eighteen (18), then you are not eligible to access and use any part of the Service.

If you have any questions regarding the collection, storage, use, or disclosure of your Personal Information, please contact the Company’s Data Protection Officer (“DPO”) and privacy team at [privacy@ptw.com](mailto:privacy@ptw.com)

## 1. PURPOSE

The purpose of this Privacy Policy is to enable you to understand, and to help the Company ensure, that your Personal Information (and the Personal Information of others who are also authorized to access and use the Service) is collected, stored, used, and disclosed in accordance with applicable law. The Personal Information provided by you or otherwise obtained by the Company in connection with your access to and use of the Service will be protected by the Company in accordance with the terms and subject to the conditions set forth in this Privacy Policy. More specifically, the Company's Privacy Policy describes:

- The types of Personal Information that may be collected and why such information is collected.
- The purposes for which Personal Information may be used.
- How Personal information can be accessed, updated, and deleted; and
- The types of third-party service providers to whom Personal Information may be disclosed.

## 2. COLLECTION OF PERSONAL INFORMATION

When you access and use the Service, the Company may collect, store, use, and disclose certain information, including Personal Information, regarding you, your computing device, and your online activities.

Prior to using the Service, you will be given the opportunity to formally indicate that you are legally entitled to accept, and that you agree to abide by, all of the terms and conditions set forth in this Privacy Policy. Additionally, by accessing the Service, you shall be deemed to have indicated that you accept, and that you agree to abide by, all of the provisions of this Privacy Policy, and you grant consent for the Company to collect, store, use, and disclose your Personal Information as described in this Privacy Policy. If you choose to access and use the Service on behalf of another person or entity, you represent and warrant that you are formally authorized by such person or entity (e.g., pursuant to a written agreement to which you are a party, etc.) to (a) accept, and agree to abide by, all of the provisions of this Privacy Policy on behalf of such other person or entity; and (b) grant consent, on behalf of such other person or entity, for the Company to collect, store, use, and disclose Personal Information of or concerning such person or entity as described in this Privacy Policy.

## 3. PERSONAL INFORMATION THAT MAY BE COLLECTED

The Company may automatically collect information such as logs and usage data when you access and use the Service. This may include your IP address, [user-agent string](#), browser type, operating system, device information, pages visited, links clicked, and search terms.

The Company collects the Internet Protocol ("IP") address of your computing device for the

purpose of enabling you to participate in the Service and other features and functionalities of the Service that you, at your discretion, choose to access and use for your business needs. The Company may also collect the following categories of Personal Information online activities that relate to the Services: full name, email address, contact details, location information, analytics information and data, electronic data, marketing data, user information, transactional details and related data. The collection of such Personal Information may be accomplished by your voluntary submission of such information or may be collected as a result of the use of “cookies” and other such technologies, and the Company’s policies and practices regarding such collection activities are described in greater detail in [Section 4](#) of this Privacy Policy.

The Company collects Personal Information so that it is able (a) to provide you with the Service; (b) to communicate with you; (c) for analytics purposes; (d) for marketing purposes; (e) to monitor security incidents; and (f) to comply with legal obligations under applicable law. As referenced above, the IP address of your computing device (e.g., laptop, smartphone, etc.) is collected so that you are able to easily access the Service and to enable you to readily participate in the features and functionalities that are of interest to you (e.g., to recognize your computing device, browser, etc.) whenever you access and use the Service, if deemed necessary or otherwise appropriate by the Company, at its sole discretion, to contact you or to respond to your communications, to take action against you (or others who use your account) in the event of any misuse of the Service, or any other breach or default of any material provision of this Privacy Policy or the Company’s related Terms of Usage (“**TOU**”), or any other policies, or related agreements that may be adopted by the Company, at its sole discretion, and that are applicable to the Service (collectively, the “**Other Policies**”).

Additional information regarding the types of Personal Information collected or that may be collected, and how such information is used or may be used, is referenced hereinafter:

### **3.1. Contact Details**

The Company collects Personal Information regarding your contact details (e.g., first and last name, e-mail address, company name, company phone, etc.) so that the Company can respond to your inquiries and electronic communications with the Company or any of the Company’s representatives, including, but not limited to, your communications by email, by means of any third-party social media, or as part of any other communications or submission methods that are made available by means of the Service. If you communicate with the Company’s representatives through social media, the Company will have access to the information that you make publicly available on any such platform or any related website(s). Contact details may also be collected if you subscribe to any newsletters that are made available by the Company. You may also provide, at your option, your mobile phone number, which may be used, along with your email address, to contact you and to communicate with you about our Service.

### **3.2. Location Details**

With your consent, the Company may collect or track real-time geo-location to enhance access to the Service. Such information may be combined with an identifier associated with your device to enable the Company to recognize your device when you later access and use the Service while at a different location. You may choose, at your option, to update your device settings, to stop accessing and using the Service, and such decisions will enable you to stop the collection of such information.

### **3.3. Analytics Data**

The Company may collect analytics data, including, but not limited to, (a) session statistics, (b) approximate geolocation, (c) browser and device information (d) time you spend accessing and using the Service, (e) your unique device identifiers, and (f) diagnostic information and related data, all for analytics purposes. Please refer to [Sections 4](#) and [5](#), below, to learn more about analytics cookies. The analytics data that the Company may collect is anonymized and aggregated so that it does not personally identify individual users, and such data is customarily stored, used, and disclosed in an aggregated, de-identified form that is not associated with specific individuals. Aggregated data or anonymous identifiers can, in theory, be combined with other information to identify an individual and, in such circumstances, could constitute Personal Information. The Company typically uses analytics data to better understand and confirm the existence of any material bugs or other defective code in the Service, to identify which pages of our Website are popular, in connection with the Company's efforts to improve the Service, and for similar purposes. However, the Company reserves the right to process, aggregate, analyze, benchmark, share, disclose, distribute, and otherwise use any Personal Information for all lawful purposes and in such manner as the Company deems appropriate, at its sole discretion, subject to compliance with all applicable laws regarding any Personal Information.

### **3.4. Electronic Data**

Electronic data regarding your activities online is automatically collected when you navigate the Internet, including, for example, when you choose to access and use the Service. Electronic data may include information such as your device's IP address, browser type, browser version, and webpages of or concerning the Service that you, at your option, elect to visit. Electronic data is collected because it is necessary in order to provide you with access to and use of the Service (e.g., to recognize your browser default language, to provide you with your selected language preference, to provide localized content (as may be required under applicable law), to maintain the Service, and for other similar purposes).

### **3.5. Marketing Data**

The Company may use "cookies" and other comparable technologies (e.g., web beacons, device graphs, etc.) in order to remember your preferences, to customize content for you, and

to provide you with advertising and marketing materials that are believed to be of interest to you (aka, “interest-based advertising”). However, please be advised that the Company will request your consent before undertaking any interest-based advertising.

Even without the use of such advertising and marketing cookies (aka, retargeting cookies), you would still receive advertising and marketing materials, but they would not be personalized for you. Using retargeting cookies allows you to receive news, information about events, and general information about services, and/or content which the Company, subsidiaries, and affiliates make available based on your interactions with the Service that may be similar to items that you have previously viewed or purchased.

Subject to your consent and in accordance with applicable law, the Company may use your Personal Information to provide you with advertising, marketing, and promotional materials, newsletters, and other information that the Company believes may be of interest to you. You may opt out of receiving such communications from the Company by accessing and activating the unsubscribe link by following instructions provided by the Company (e.g., via e-mail or other notification method, etc.), or by contacting the Company (as referenced in [Section 19](#), below). Please refer to [Sections 4](#) and [5](#), below, for additional information regarding how the Company uses cookies and other such technologies, and how you can elect to opt-out from the Company’s use of certain cookies (including retargeting cookies) and stop the collection of such Personal Information.

### **3.6. Actions You Take**

The Company gathers data regarding your activities while using the Service. This encompasses your engagement with content, such as saving, reporting, and other actions you perform while using the Service.

## **4. COOKIES AND SIMILAR TECHNOLOGIES**

The Company uses both first-party and third-party cookies:

### **4.1. First-Party Cookies.**

First-party cookies are produced by the Company or its subsidiaries or affiliates, and such cookies are implemented, retrieved, used, and deleted only by the Company. First-party cookies are used for purposes that are specific to the Service, such as, for example, to personalize your experience while using the Service.

### **4.2. Third-Party Cookies.**

Third-party cookies are produced by third parties that are not subsidiaries or affiliates of the Company in connection with new features, functionalities, or content relating to the Service, and for other lawful purposes (e.g., to provide interest-based advertising to you and to other intended recipients), and such cookies are implemented, retrieved, used, or deleted only by



such third parties or by the Company in accordance with the Company's agreements with any such third parties.

The Company uses the following types of cookies as part of the Service:

#### **4.3. Essential Cookies**

Essential cookies are those that are necessary for the Service to function as intended, and to ensure the integrity and security of your access to and use of the Service. Without these cookies, the Service may not be available to you, or may not function securely or in the manner intended by the Company.

The Company also collects device identifiers that specifically relate to each device that you elect to use to access and use the Service, and that enables you to select from multiple devices when accessing and using the Service.

#### **4.4. Functional Cookies**

Functional cookies are required for specific features or functionalities of the Service to work in the manner intended by the Company. Functional cookies also include preference cookies that are used to customize and personalize your interactions and activities with respect to the Service (e.g., recognizing your preferred language, browser type, consent settings, etc.).

#### **4.5. Analytics and Performance Cookies**

Analytic and performance cookies are used to track information about your use of the Service, and, in general, traffic involving the Service, including, for example, your social media and other activities when accessing and using the Service. The information gathered by means of these types of cookies is typically linked to a pseudonymous identifier associated with the device you select to access and use the Service. The Company may also use such cookies to obtain information and related data regarding the performance and effectiveness of the Company's advertisements, webpages, the features and functionalities of the Service, and to assess how you and other users react and interact with the audiovisual content that the Company makes available as part of, and by means of the Service.

#### **4.6. Targeting Cookies**

Targeting cookies are used to identify and provide advertising and marketing materials, including interest-based advertising, based on your self-identified interests, and your prior interactions and activities in connection with the Service. Targeting cookies are also used to limit the number of times you see any particular advertising or marketing materials, as well as to help the Company measure and evaluate the effectiveness of particular advertising or marketing campaigns.

## 5. MANAGING YOUR COOKIE PREFERENCES

With respect to the Website, you can disable cookies by managing your preferences settings. You can access a webpage describing the preferences settings for the Website by clicking on the following link: <https://www.ptw.com>. NOTE: When you disable cookies by changing browser settings or using the “anonymous browsing,” cookies will no longer collect your information.

Third-party web browsers and devices also offer tools and preferences settings that allow you to control cookies, which usually include the right to block cookies, to manage and control the cookies that are stored on your device, and notifications when the browser or device that you choose to use are subject to cookies. Please be advised, however, that if you choose to block all cookies, you may not be able to access all of the features and functionalities of the Service.

Depending on the browser that you elect to use, different instructions are applicable for managing your cookie preferences. You may access such information by clicking on the link referenced hereinafter that corresponds to the particular browser that you use:

[Google Chrome](#)

[Safari](#)

[Firefox](#)

[Internet Explorer](#)

You may also use third-party software applications to help you with your cookie preferences, such as, for example, [AdChoices](#), which provides additional solutions and explanations to control and even block cookies, as well as plug-ins to retain opt-out cookie preferences (even if you delete your cookies), and/or [WebChoices](#), which is a browser-based tool for opting out of interest-based advertising.

You may also opt-out of having your online activities when accessing and using the Service made available to Google Analytics by installing the [Google Analytics opt-out browser add-on](#), which can be used to prevent the Google Analytics JavaScript from sharing information with Google Analytics regarding your activities. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>.

If you elect to use a smartphone or other mobile device to access and use the Service, you can choose to opt-out of receiving interest-based advertising and obtain additional information regarding your particular type of mobile device by clicking on the link referenced below that corresponds to your device:

[Android](#)

[Apple](#)

Mobile device app stores (e.g., the Apple App Store, the Google Play store, etc.) may also provide interest-based advertising, and you may elect to opt-out of such activities and related content by managing the app store’s preferences. Mobile phone users can also elect to download the Digital Advertising Alliance App Choices tool at [Apple App Store](#) or [Google Play Store](#) to change and otherwise manage your consent to interest-based advertising in

connection with your access to and use of the Service by means of any such mobile device.

The Website uses a tool called “Google Signals” to collect information about use of the Website. When we activate Google Signals, some existing Google Analytics features are updated to also include aggregated data from Google users who have turned on “Ads Personalization.” Audiences that we create in Google Analytics and publish to Google Ads and other Google Marketing Platform advertising products can serve ads in cross device-eligible remarketing campaigns to Google users who have turned on Ads Personalization. Google Analytics collects additional information about users who have turned on Ads Personalization, based across device types and on aggregated data from users who have turned on Ads Personalization. The data is user based rather than session based. The Cross Device reports include only aggregated data. No data for individual users is ever exposed. You can modify your interests, choose whether your Personal Details are used to make ads more relevant to you, and turn on or off certain advertising services in the AdsPersonalization available at <https://support.google.com/ads/answer/2662856/>.

## **6. PERSONAL INFORMATION REGARDING YOUR DEVICE**

The Company, and the third parties with which the Company contracts for the provision of certain services of or concerning the Service, may use Personal Information regarding your device, which information you choose to provide, and that may otherwise be collected by the Company or any such third party, for the following purposes:

- To collect information and data regarding the network to which your device is connected (whether wired or wireless) in order to diagnose and optimize the operation, security, and performance of your connection to the Service;
- To collect device/hardware-related information and data regarding your device in order to optimize the operation, security, and performance of your device with respect to the Service; and
- To collect software-related information and data regarding your device in order to optimize the operation, security, and performance of your device with respect to the Service.

## **7. DISCLOSURES OF PERSONAL INFORMATION TO THIRD PARTIES**

The Company may disclose your Personal Information to third parties that are contracted by the Company to provide certain services that relate to the Service (e.g., data-hosting, purchase transactions, payment gateways, analytics, etc.). Please be advised, however, that the Company is not a data broker and the Company does not sell your Personal Information to third parties. In addition to the Company's sharing of your Personal Information with such third-party service providers, the Company may also disclose such Personal Information in connection with the following:

### **7.1. Law Enforcement**

Under certain circumstances, the Company may be obliged to disclose your Personal Information in response to a request received from a government authority, an administrative agency, or a court of competent jurisdiction. Please be advised that it is the Company's policy to disclose Personal Information to such third parties only when the Company is legally required to do so, and only after the Company has made its own verification of the legality and scope of the requested disclosure of any Personal Information.

### **7.2. Business Transactions**

The Company may disclose your Personal Information in connection with, or during negotiations regarding, for example, a potential acquisition of all or a portion of the Company's business, or a merger, sale of assets, or other proposed transaction with another entity or potential group of investors, etc.

### **7.3. Other Legal Requirements**

The Company may be obliged to disclose your Personal Information if the Company is required to do so by any applicable legal requirement, such as, by way of example, and not as a limitation upon the generality of the foregoing, in connection with any of the following events or circumstances:

- to prevent, or to investigate, any possible wrongdoing that relates in any manner to the Service (e.g., any breach or default of any material provision of this Privacy Policy, or of the Company's TOS , or of any of the Other Policies;
- to protect the Company's rights and interests, and to defend the Company in a lawsuit or other legal proceeding; and
- to comply with any legal obligation that may be incurred by or otherwise imposed on the Company or any of its subsidiaries or affiliates.

## **8. STORING AND RETAINING YOUR PERSONAL INFORMATION**

The Company will store and retain your Personal Information for as long as necessary or as otherwise deemed appropriate by the Company, in its sole discretion, (a) in order to provide you access to and use of the Service; (b) to enable the Company, in good faith, to attempt to resolve any dispute that may arise between you and the Company; and (c) to comply with the Company's obligations under applicable law.

This Privacy Policy is applicable to the Company's operation of the Service in the United States and other countries outside of the United States in which any of the Company's subsidiaries, affiliates, and third-party service providers are located. In connection with such operations and related activities, the Company collects and stores Personal Information in the cloud using third-party technology and facilities located in the United States. Please be advised that the applicable laws regarding the security and protection of your Personal Information in a jurisdiction outside of the United States may be different than the applicable laws regarding the security and protection of your Personal Information in the United States; provided, however, your Personal Information will be collected, stored, used, and disclosed to the Company's subsidiaries, affiliates, and third-party service providers only in accordance with the laws, statutes, treaties, directives, rules and regulations that are applicable to the Company's activities and any such third party's activities regarding such matters.

## **9. SECURITY REGARDING YOUR PERSONAL INFORMATION**

We use industry-standard security measures to keep your Personal Data confidential and secure, except as otherwise provided in this Privacy Notice, or unless such disclosure is necessary in special cases, such as a physical threat to you or others, as permitted by applicable law. Because the Internet is not a 100% secure environment, we cannot guarantee the security of Personal Data, and there is some risk that an unauthorised third party may find a way to circumvent our security systems or that transmission of your information over the Internet will be intercepted.

The Company restricts access to your Personal Information to authorized users only, regularly evaluates new security technologies to protect the security of your Personal Information and strives to adopt and implement security measures based on industry standards to maintain the confidentiality, integrity, and availability of your Personal Information. However, please remember that it is also important that you take precautions when you use your device to connect to the Internet and choose to access and use the Service, especially whenever you choose to use any public Wi-Fi network in connection with any of your activities online. It is your responsibility to guard your Personal Information and do not share it with any other users of the Service. Please remember that any such use or disclosure of any of your Personal Information is not an act for which the Company has any obligation or responsibility (legally or otherwise), and the Company hereby expressly disclaims any obligation or liability of any kind or nature with respect to any such matter, including, without limitation, any acts or failures

to act by any other persons or entities with respect to your public communications and/or postings, or any other content that you choose to publicly disclose in connection with the Service.

## **10. THIRD-PARTY WEBSITES**

As noted above, this Privacy Policy is applicable to Personal Information that is provided by you or otherwise obtained by the Company in connection with the Service. Please remember that if you choose to click on an advertisement, dynamic link, or any other process or technology (whether now known or that hereafter comes into existence) that allows you to leave the Service and visit a website, application, product, service, or content of a third party that is not a subsidiary or affiliate of the Company, then, in such event, the Company's Privacy Policy is not and shall not be applicable to such third party's website, products, services, content, or any related activities, including, without limitation, such third party's collection, storing, use, and/or disclosure of any of your Personal Information. The inclusion of any such advertisement, dynamic link, or other process or technology does not imply any endorsement by the Company of any such third-party website or of such website's owner or operator, or of any product, service, content, information, or data that is accessible by means of any such third-party website. Please be advised that it is always a good idea, and the Company strongly encourages you, to carefully read the privacy policies and the TOU that may have been adopted by any such third parties in order to help ensure that you fully understand each third party's policies and practices in connection with the collection, storing, use, and disclosure of your Personal Information that may be collected by such third party. The Company expressly disclaims all responsibility and obligations, as well as any and all potential liability, with respect to your decisions, at your sole discretion, to access any third-party website and to use any product, service, feature, functionality, content, information, or data that is made available or otherwise accessible by means of any such third-party websites. For the avoidance of doubt, you acknowledge that the Company does not control or monitor any such third-party websites and you hereby acknowledge that the Company does not have any responsibility or any obligations, and you hereby irrevocably agree that the Company does not and shall not have any liability of any kind or nature, with respect to any such third-party websites.

## **11. PERSONAL INFORMATION REGARDING CHILDREN**

This Privacy Policy covers the Company's privacy-related practices regarding access to and use of the Service, by you and other authorized individuals who accept and agree to abide by all of the provisions of this Privacy Policy, the Company's related TOU, and any Other Policies, and other agreements that may be adopted by the Company at any time and from time to time, that specifically relate to the Service. As noted above, and as expressly referenced in the Company's TOU, you must be 18 years of age (or older) to access and use the Service. Please be advised that the Service is not advertised or otherwise directed to children, and the Company does not knowingly

collect, store, use, sell, or disclose any Personal Information from anyone who is under the age of eighteen (18). If you learn or become aware that a child has provided any Personal Information to the Company, please contact the Company's DPO or privacy team, at [privacy@ptw.com](mailto:privacy@ptw.com), or by means of the additional information referenced in [Section 19](#) (Contact Us), below.

## **12. RIGHTS REGARDING PERSONAL INFORMATION UNDER APPLICABLE STATE LAWS**

The laws of various States in the U.S.A. may provide you with specific rights with respect to your Personal Information (e.g., California, Colorado, Connecticut, Utah, and Virginia). However, please be advised that your rights will vary depending on the laws that apply to you in the State in which your primary residence is located. Some of the personal rights that may apply to you (depending upon where you lawfully reside) include the following:

- the right to request the Company to provide information to you regarding the Company's collection and use of your Personal Information,
- the right to request the Company to correct, amend, or otherwise modify your Personal Information if such information is or becomes inaccurate, ambiguous, incomplete, invalid, or outdated,
- the right to have your Personal Information deleted (subject to certain exceptions),
- the right to limit the use and disclosure of Sensitive Personal Information (e.g., debit/credit card, driver license, etc.) in certain circumstances,
- the right to obtain a portable copy of Personal Information,
- the right to opt out of targeted advertising or sharing of Personal Information; and
- the right to appeal our decision about your requests.

### **12.1. Verifiable Consumer Requests**

In order to initiate any of the above-referenced rights (if applicable to you), you must provide the Company with a written request for the desired action, using the following email address: [privacy@ptw.com](mailto:privacy@ptw.com), with the subject line "State Privacy Rights," or by writing to the Company using the information below.

PTW America, Inc.  
**Attn: DPO - State Privacy Rights**  
1042 Princeton Drive, Suite B  
Marina Del Rey, CA 90292

Please be advised that only you (if you are 18 years of age or older), is entitled to submit a verifiable consumer request that relates in any manner to your Personal Information.

In order to be validly effective, a "verifiable consumer request" needs to provide the Company

with sufficient, reasonably detailed information that will enable the Company (a) to take appropriate steps to verify your identity and to confirm that you are, in fact, the individual whose Personal Information was collected by or for the Company, or that you are a legally authorized representative of the individual whose Personal Information was collected; and (b) to sufficiently understand, reasonably evaluate, and to respond to your request in a reasonable and appropriate manner.

Please understand that the Company will not be able to respond to your request, nor to take appropriate action with respect to the particular Personal Information referenced in such request, if the Company is unable to verify your identity or the identity and legal authority of your representative (e.g., a parent or legal guardian) to submit such request, or is otherwise unable to confirm that the affected Personal Information specifically relates to you.

If you are entitled to exercise any of above-referenced rights with respect to your Personal Information, and applicable law and the specific circumstances regarding your request allows for such exercise, the Company will accommodate your request without imposing any additional charge. However, please be advised that if you request a transcription, reproduction, or transmission of any or all of your Personal Information, the Company reserves the right (subject to applicable law) to charge a reasonable fee to process and fulfill your request, and, in such case, the Company will contact you regarding any applicable charges before fulfilling your request.

If you request that the Company correct, amend, or otherwise modify your Personal Information, then, promptly after the Company receives such a request from you and the Company confirms your identity, account, and the information contained in the verifiable consumer request that you choose to submit, the Company will use its commercially reasonable efforts to fulfill your request (subject to certain exceptions under applicable law), and in any event within **forty-five (45) days** after the date on which the Company receives your verifiable consumer request (which timeframe may be subject to extension taking into account the nature of your affected Personal Information and the purposes for which such Personal Information was collected, used, and disclosed by the Company to any third-party service providers and other business partners, if and to the extent applicable) or within the required response time under applicable law, whichever occurs first.

If you request that the Company delete your Personal Information in connection with the Service, then promptly after the Company receives such a request from you and the Company confirms your identity, account, and the information contained in the verifiable consumer request that you choose to submit, the Company will use its commercially reasonable efforts to fulfill your request, including, without limitation, the issuance of appropriate instructions to any third-party service providers and business partners (if applicable) to delete the Personal Information referenced in your request from such third parties' records (subject to certain exceptions under applicable law) and in any event within **forty-five (45) days** after the date on which the Company receives your verifiable consumer request (which timeframe may be subject to extension taking into account the nature of your affected Personal Information and the purposes for which such Personal Information was collected, used, and disclosed by the



Company to any third-party service providers and other business partners, if and to the extent applicable) or within the required response time under applicable law, whichever occurs first. Please be advised that the requested deletion of your Personal Information may not need to be fulfilled if retention of your Personal Information is required to be maintained by the Company, or any third-party service providers or business partners, in connection with any of the following events or circumstances:

- to help ensure the integrity and security of the Service (in the event and to the extent that your Personal Information is reasonably required and proportionate to the integrity and security of the Platform and the Websites),
- to identify, debug, and repair programming errors or other defects in the Service, which errors or defects adversely affect the intended and proper functioning of the Service,
- to enable internal uses (only by the Company) that are consistent with user expectations that reflect the relationship between you and the Company and that are not inconsistent with the context in which your Personal Information was originally collected,
- to engage in public or peer-reviewed historical, scientific, or statistical research that is in the interest of the public and that abides by applicable ethics and privacy laws, and, if you previously provided your consent, in the event that the deletion of your Personal Information would foreseeably make such research impossible or materially and adversely affect the likelihood that such research can be successfully completed,
- to exercise free speech rights or the exercise of another right protected by applicable law, including, but not limited to, the free speech rights of any other person who is authorized to access and use the Service,
- to complete a transaction that required the Company to collect your Personal Information, or to complete the Company's provision of any particular services that you requested, or for the Company to otherwise perform its obligations pursuant to any of the agreements with you,
- to perform or to comply with the terms and conditions of any written warranty agreement, or to fulfill any product recall obligation required to be performed under applicable state or federal law,
- to perform or to comply with any of the Company's other legal obligations,
- to comply with the California Electronic Communications Privacy Act.

Please be advised that the Company will take reasonable steps, in accordance with applicable law, to respond and fulfill the action that is specifically referenced in your verifiable consumer request; provided, however, if the Company has a legitimate interest in retaining any particular Personal Information (e.g., to prevent illegal activity, or as may be needed to create reasonable documentation of your verifiable consumer request and of the Company's activities in response to such request, etc.), the Company may not be required to comply with a request to delete all instances of your Personal Information. In addition, there are particular

circumstances that, under applicable law, relieve and may actually prohibit the Company from complying with a request regarding any or all of your Personal Information (e.g., if the Company is unable to confirm your identity, or the requested action adversely affects others who are authorized to access and use the Service, or the Company receives excessive requests regarding your Personal Information, etc.).

In the event that the Company is entitled to deny your request, the Company will notify you in writing and provide you with information regarding how you can contest such decision. The Company will retain the relevant Personal Information that is the subject of your verifiable consumer request until such time as you have exhausted any right of appeal to which you may be entitled under applicable law. In any event, the Company will respond to your written request regarding your Personal Information within **forty-five (45) days** of the date of receipt of your written request or within the response period set by applicable legislation, whichever occurs first.

If you have any questions or concerns with respect to regarding what Personal Information the Company actually collects, or how the Company collects, stores, uses, or discloses your Personal Information, or regarding the manner or substance of the Company's response to your verifiable consumer request, please contact the Company's support team, at [privacy@ptw.com](mailto:privacy@ptw.com), or by writing to the Company using the information referenced in [Section 19](#) (Contact Us), below.

Please be further advised that, under applicable law, you may be entitled to submit a complaint to the privacy regulator in the State in which your primary residence is located.

Non-Discrimination. The Company values its relationship with you and will not discriminate against you as a result of you choosing to exercise any of your rights regarding your Personal Information under applicable law (which may vary based on the State in which your primary residence is located). Please be advised that, except as may be permitted by applicable law or otherwise result from your breach or default of any material provision of this Privacy Policy or any of the other agreements between the Company and you (e.g., the Company's TOS), or Other Policies), the Company will not (a) deny you the right to have authorized access to and use of the Service; (b) provide to you any different features, functionalities, or content, that is then-currently being made available by the Company in connection with the Service; or (c) offer or charge you any different price(s) for your authorized right to access and use the Service as compared with the price(s) that are then-currently being offered or charged by the Company to others who have been granted identical rights to access and use the Service.

### **13. RESIDENTS OF CALIFORNIA AND CCPA PRIVACY NOTICE**

In the event of any conflict or inconsistency with respect to the provisions of this Section 13 and the provisions of any other Section of this Privacy Policy, this Section 13 sets forth the controlling provisions with respect to any such matters.

#### **13.1. California's Online Privacy Protection Act**

The Company does not track users of the Service over time and/or across any third-party

websites or online services, and, accordingly, the Company does not take action in response to web browser “Do Not Track” signals or other mechanisms that provide consumers the ability to exercise choices regarding the collection of personally identifiable information about an individual consumer’s online activities over time and across third-party websites or online activities.

### **13.2. California’s Shine the Light Law**

Residents of California may request the Company to provide information regarding disclosures of Personal Information that may have been provided to third parties during the prior calendar year in connection with direct marketing purposes. If your primary residence is located in California and you would like to request information regarding the Company’s privacy-related activities, including the Company’s compliance with the California Shine the Light Law, please submit your request via email to [privacy@ptw.com](mailto:privacy@ptw.com), with the subject line “California Shine the Light Law” or send your request by pre-paid mail to the below address:

Attn: DPO – California Shine the Light Law  
PTW America, Inc.  
1042 Princeton Drive, Suite B  
Marina Del Rey, CA 90292

### **13.3. California Consumer Privacy Act of 2018**

In addition to the Company’s full Privacy Policy, this CCPA Privacy Notice applies to certain California residents (collectively, “Consumers”) from whom Personal Information is collected by or for the Company as a business under the California Consumer Privacy Act of 2018 (California Civil Code §§ 1798.100 to 1798.199) and its implementing regulations, as amended or superseded from time to time (the “CCPA”).

For purposes of this CCPA Privacy Notice, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household, or as otherwise defined by the CCPA.

Personal Information does not include information that is: (a) lawfully made from government records; (b) de-identified or aggregated information that does not identify and cannot reasonable be linked to a particular consumer or household; or (c) otherwise excluded from the scope of the CCPA.

As used herein, the term “Consumer” does not include a natural person acting as a job applicant, employee, owner, director, officer, medical staff member, or contractor of the Company to the extent such person’s Personal Information is collected within the context of any such person acting in any of such role or capacity.

### **13.4. California Consumers’ Rights and Choices:**

If you are a Consumer, the CCPA may permit you to request information regarding the

following:

- the categories of your Personal Information (as defined by the CCPA) collected, sold or disclosed by the Company,
- the categories of purposes for which your Personal Information was collected, sold or disclosed,
- the categories of sources from which Personal Information was collected,
- the categories of third parties to whom Personal Information was sold or disclosed; and
- the particular items of Personal Information that have been collected (including, in some cases, Personal Information of or concerning your household).

In addition, if you are a Consumer, you may elect to:

- Opt out of receiving marketing communications from the Company; provided, however, you may still receive administrative communications regarding the Company's services,
- Opt in to receive certain financial incentive programs that the Company may offer related to the collection, retention, or sale of your Personal Information; and
- request that the Company, and any applicable third-party service providers and business partners, delete your Personal Information (subject to certain limitations in some circumstances).

Further, the CCPA provides Consumers with the right not to receive discriminatory treatment by a business for the exercise of the above-referenced privacy rights, subject to certain limitations.

### **13.5. Collection and Disclosure of Personal Information of or concerning Consumers:**

The tables referenced below summarize the categories of Personal Information, and how the Company handles Personal Information collected from and about Consumers, in the preceding twelve (12) months from the date of the Company's receipt of a verifiable Consumer request.

### **13.6. Categories of Personal Information the Company may collect: Identifiers**

The Personal Information contains: The Identifiers may contain the following categories of information: IP addresses, names, email addresses, player IDs, and device information.

Whether sales or other disclosures of Personal Information occurred in the previous 12 months:

The Company has not sold Personal Information in the previous 12 months. However, the Company may have otherwise shared such Personal Information with third parties in the previous 12 months.

Categories of Third Parties to whom such Personal Information was disclosed: The Company may have shared such Personal Information with the following categories of third parties: operating systems and platforms, social networks, affiliates, third-party service providers, third

parties integrated into our services, third parties as required by law and similar disclosures.

Categories of Personal Information the Company may collect: Internet/Electronic Activity

The Personal Information contains: The Internet/Electronic Activity may contain the following categories of information: IP addresses, names, email addresses, player IDs, and device information.

Whether sales or other disclosures of Personal Information occurred in the previous 12 months: The Company has not sold Personal Information in the previous 12 months. However, the Company may have otherwise shared such Personal Information with third parties in the previous 12 months.

Categories of Third Parties to whom such Personal Information was disclosed: The Company may have shared such Personal Information with the following categories of third parties: third-party service providers, third parties integrated into our services, third parties as required by law and similar disclosures.

### **13.7. Use of Personal Information:**

Personal Information may be used for the purposes disclosed to Consumers at the time of collection as set forth in the main body of the Company's Privacy Policy and as set forth in this CCPA Privacy Notice, and for the purposes of: providing the Company's services, communicating with Consumers, verifying Consumers' identities, developing and providing marketing materials, personalizing the experience of Consumers in connection with the Company's services (including providing tailored content), facilitating transactions and payments, responding to trust and safety issues, complying with judicial process or government requests, auditing related to current interactions with Consumers and concurrent transactions (including but not limited to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards), detecting security incidents (including protecting against malicious, deceptive, fraudulent, or illegal activity) and prosecuting those responsible, debugging to identify and repair errors that impair existing intended functionality, performing services on behalf of the Company or on behalf of third-party service providers (including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services and/or providing similar services for the Company or third-party service providers' short-term transient use). The Personal Information may also be used or disclosed as otherwise permitted or required by applicable law.

### **13.8. Collection of Personal Information:**

In the preceding twelve (12) months from the date this CCPA Privacy Notice was last reviewed, the Company has collected Personal Information from the following categories of sources: directly from you (e.g. forms you complete, products and services you purchase, etc.) and other Consumers, and from third-party operating systems, browsers, devices, and platforms.

### **13.9. Sales of your Personal Information:**

The Company is not in the business of selling Personal Information and has not sold your Personal Information in the preceding twelve (12) months from the date of the last review of this CCPA Privacy Notice.

If you have any questions or concerns with respect to what Personal Information the Company actually collects, or how the Company collects, stores, uses, or discloses your Personal Information, or regarding the manner or substance of the Company's response to your verifiable Consumer request, please contact the Company's support team, at [privacy@ptw.com](mailto:privacy@ptw.com). Please be advised that the Company does not accept or process requests regarding Personal Information through any other means (e.g., via fax, social media, etc.).

The Company will review the information provided and may request additional information to ensure the Company is interacting with the correct Consumer. If you have a password-protected online account with the Company, you may be required to log-in to your account for identity verification. If you do not have an account with the Company, additional information to verify your identity may be required by law before the Company may take action upon such a request. This additional information may vary depending on the nature of your request and/or the nature of the information about which your request relates. In some cases, the Company may also be required by law to obtain a signed declaration under penalty of perjury from you or, if applicable, from a parent or legal guardian, that you are the subject of the request being made. If the Company suspects fraudulent or malicious activity by means of or otherwise in connection with your account, the Company will delay taking action on your request until the Company can appropriately verify your identity and your verifiable Consumer request as authentic.

By law, the Company is not required to collect Personal Information that the Company otherwise would not collect in the ordinary course of our business or retain Personal Information for any period longer than the Company would otherwise retain such information in the ordinary course of the Company's business or re-identify or otherwise link information that is not maintained in a manner that would be considered Personal Information. If the Company has not requested specific additional information from you to confirm your verifiable Consumer request, please do not send such information.

The Company will endeavor to avoid requesting additional information from you for verification purposes. However, if representatives of the Company cannot reasonably verify your identity or more information is needed for security or fraud-prevention purposes, the Company may consider any of the following factors, alone or in combination, in requesting additional information: the type, sensitivity, and value of the Personal Information collected and maintained about the Consumer, as applicable law requires a more stringent verification process for sensitive or valuable Personal Information, including, the following:

- The risk of harm to the Consumer posed by any unauthorized access or deletion,
- the likelihood that fraudulent or malicious actors would seek the Personal Information,

- whether the Personal Information to be provided by the Consumer to verify their identity is sufficiently robust to protect against fraudulent requests or being spoofed or fabricated;
- the manner in which the Company interacts with the Consumer,
- available technology for verification; and
- other factors that may be reasonable in the circumstances, are consistent with industry practice, are recommended by California government officials, or which may be required by law or regulation following the effective date of this CCPA Privacy Notice

If your verifiable Consumer request specifically relates to household information, the same verification steps referenced above may be required before the Company can provide you with aggregate household information. In addition, if you do not have a password-protected online account with the Company, in order to process a request for access to or deletion of specific pieces of information regarding your household, the Company may need all members of the household to make the request and may need to individually verify each household member and that each member making the request is currently a member of the applicable house.

The Company reserves the right to charge a reasonable fee or take other appropriate action in response to requests from a Consumer or household that are manifestly unfounded or excessive, in particular because of their repetitive character.

### **13.10. Authorized Agent Requests**

You may designate an authorized agent to make a verifiable Consumer request on your behalf in accordance with applicable law. The Company will accept documentation of your designation in the form of a valid power of attorney or other form of legally binding written authorization signed by you and your authorized agent. You may submit evidence of your designation of an authorized agent in writing to: [privacy@ptw.com](mailto:privacy@ptw.com), or via postage prepaid mail to the Company at its address referenced in [Section 19](#), below.

The Company may require verification of your authorized agent in addition to the information for verification that is referenced above with respect to Consumers and households.

#### Notice of Financial Incentives

Please be advised that the Company does not currently offer financial incentives to Consumers based upon the collection, retention or sale of a Consumer's Personal Information.

## **14. YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION UNDER THE EUROPEAN ECONOMIC AREA (EEA), SWITZERLAND AND UK DATA PROTECTION LAWS**

This section applies where your Personal Information is handled subject to either the EEA, Switzerland, and the UK data protection laws (the General Data Protection Regulation (EU) 2016/679 and as incorporated into UK law by the Data Protection Act 2018), or data protection laws that offer equivalent rights.

### **14.1 EEA, Switzerland, and the UK Residents Privacy Rights**

You have the following rights in relation to how the Company handles your Personal Information, some of which are subject to exceptions and conditions:

- You have the right to be informed about the collection and use of your Personal Information.
- You have a right to access and receive a copy of the Personal Information we hold about you.
- If your Personal Information is inaccurate or incomplete, you are entitled to have your Personal Information rectified.
- You have the right to ask us to erase/delete and stop handling your Personal Information where we no longer need it or where you withdraw your consent.
- You have a right to restrict and object to the processing of your Personal Data.
- You have a right to request a copy of your Personal Information in a structured, commonly used, machine-readable format (“Portability”). Where technically feasible, we can send a copy of your Personal Information to another information technology environment at your request.
- Where a decision is automated and significantly affects you, you have the right to object to it or ask for a person to review the automated decision.
- The Company will ask for your consent to handle your Personal Information for specific purposes which you can withdraw at any time.
- You can submit a complaint to the Company or the relevant data protection authority.

Refer to [Section 5](#), for guidance on how to control your Personal Data in the Website or contact us via [privacy@ptw.com](mailto:privacy@ptw.com).

### **14.2 International Transfer**

If you are located in the EEA, Switzerland, and the UK and provide Personal Data to the Company, the Company will transfer your Personal Information to the Amazon Web Services (“AWS”) data center located in the U.S.A. in Northern Virginia.



The Company has implemented organizational, physical, and technological measures designed to protect your information from unauthorized access, both during transmission and storage. If you have any questions about the security of your Personal Data, you can contact us at [privacy@ptw.com](mailto:privacy@ptw.com)

However, please note that no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, although the Company complies with its legal obligations regarding the security of your Personal Information, we cannot guarantee its absolute security.

### **14.3 Data Privacy Framework (“DPF”)**

The Company complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. The Company 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 and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. The Company 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/>

For personal data received or transferred under the EU-U.S. DPF, the UK extension to the EU.U.S. DPF, and the Swiss-U.S. DPF Principles, the Company may be subject to the regulatory enforcement power of the U.S. Federal Trade Commission. In certain situations, the Company may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements where it operates.

If you have an unresolved privacy or data use concern that the Company has not addressed satisfactorily, please get in touch with the applicable Data Protection Authority where you reside in your country of residence.

Under certain conditions, more fully described on the Data Privacy Framework website <https://www.dataprivacyframework.gov/s/article/How-to-Submit-a-Complaint-Relating-to-a-Participating-Organization-s-Compliance-with-the-DPF-Principles-dpf>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

Personal data and navigational information are securely stored in the United States in Northern Virginia. The Company may access Personal Information and navigational information from locations worldwide to facilitate the Company’s global operations. This Privacy Policy shall apply even if the Company accesses Personal Information and navigational information from other countries.

To ensure that your Personal Information does receive an adequate level of protection, the Company has put in place the **Standard Contract Clauses** (SCCs) to ensure that those parties

in the United States and other countries where the Company operates to treat your Personal Information in a way that is consistent with, and which respects the EEA, Switzerland, and UK laws on data protection. If you require further information about this protective measure, you can request it from [privacy@ptw.com](mailto:privacy@ptw.com)

In compliance with the Data Privacy Framework, the Company commits to resolve complaints related to the Company's collection or use of your Personal Information. Individuals with inquiries or complaints regarding the Company's Privacy Policy should first contact the Company at [privacy@ptw.com](mailto:privacy@ptw.com) or via postage prepaid mail to the Company at its address referenced in [Section 19](#) below.

The Company has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved EU-U.S., UK extension to the EU-U.S. DPF, and Swiss-U.S. DPF complaints concerning data transferred from the EEA, Switzerland, and the UK into the United States. The non-compliance with the Data Privacy Framework will result in the Company being subject to the investigatory and enforcement powers of the Federal Trade Commission ("FTC").

#### **14.4 Accountability for Onward Transfer of Personal Data**

In cases of onward transfer to a third-party, the Company will notify you and provide an opportunity to opt-out of sharing with the third-party before disclosing your Personal Information. The Company will enter into a contract with each relevant party (Controller or Processor) to only process your Personal Information for limited and specified purposes consistent with your consent. The Company will obligate the third party to provide the same level of protection to your Personal Information as is required by the Data Privacy Framework.

In the context of an onward transfer, the Company is responsible for processing Personal Information it receives under the Data Privacy Framework and subsequently transferring to a third party acting as an agent on its behalf. The Company remains liable under the Framework if its vendors process such Personal Information in a manner inconsistent with the Framework unless it proves that it is not responsible for the event giving rise to the damage.

### **15. YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION UNDER CHINA'S PERSONAL INFORMATION PROTECTION LAW ("PIPL")**

This Privacy Policy shall apply solely when the Company processes Personal Information within the scope of laws related to the protection of Personal Information within the territory of mainland China, including the Personal Information Protection Law ("PIPL") and relevant laws, regulations, and national standards ("China Data Protection Law"). This Policy excludes Hong Kong SAR, Macau SAR, and Taiwan.

Where the Company operates in jurisdictions outside mainland China or where China Data Protection Law does not apply, descriptions, and in particular the outlined rights and obligations and limitations to processing contained in this Privacy Policy do not necessarily apply, and nothing in this Privacy Policy may be interpreted to establish rights or obligations that go beyond what is required.

“Sensitive Personal Information” refers to Personal Information that once leaked or illegally used, may easily cause the infringement to the dignity of the natural person or harm to personal or property security, including but not limited to the information on biometric characteristics, religious beliefs, specially-designated status, medical health, financial accounts, individual location tracking, as well as the Personal Information of minors under the age of 14.

You understand that the Company may request and process your Sensitive Personal Information when you interact with us. Please take special note of the Sensitive Personal Information that the Company has indicated in bold in this Privacy Notice. The Company will make you aware of how and why your Sensitive Personal Information will be processed.

For the Sensitive Personal Information that the Company processes, the Company will take appropriate security measures that correspond to the risk level of such information to prevent unauthorized access to and public disclosure, use, modification, destruction, leakage, or loss of Personal Information.

You have the following rights in relation to how the Company handles your Personal Information, some of which are subject to exceptions and conditions:

- to be informed on how the Company processes your Personal Information
- to access your Personal Information
- to rectify your Personal Information in case of any error, omissions or incomplete record
- to erase/delete your Personal Information (in the case of one of the listed events below)
  - the handling purpose has been achieved, is impossible to achieve, or the Personal Information is no longer necessary to achieve the handling purpose,
  - Personal Information handlers cease the provision of products or services, or the retention period has expired,
  - the individual rescinds consent,
  - where Personal Information handlers have handled Personal Information in violation of laws, administrative regulations, or agreements; or
  - other circumstances provided by laws or administrative regulations.
- to object/opt-out
- to request data Portability
- not to be subject to automated decision-making
- to copy your Personal Information and restrict processing of your Personal Information.

In terms of deceased individuals, their next of kin may, for the sake of their own lawful, legitimate

interests, exercise the rights to consult, copy, correct, delete, etc., the Personal Information of the deceased, except where the deceased individuals have other arrangements before their death.

## **16. YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION IN CANADA**

If you are accessing the Service from Canada, you have certain rights under the Personal Information Protection and Electronic Documents Act (“PIPEDA”) which is the federal privacy law for Canada; and the Quebec Law 25 which is the applicable regulation for private-sector organizations in Quebec.

The Company will retain any information you choose to provide to the Company until the earlier of: (a) you asking the Company to delete your Personal Information, (b) the Company’s decision to cease using the Company’s existing data providers, or (c) the Company decides that the value in retaining your Personal Information is outweighed by the costs of retaining it.

You have the right to request access to your Personal Information that the Company stores and the rights to either rectify or erase your Personal Information.

You have the right to seek restrictions on the processing of your Personal Information.

You have the right to object to the processing of your Personal Information and the right to the Portability of your Personal Information.

To the extent that you provided consent to our processing of your Personal Information, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based upon consent that occurred prior to your withdrawal of consent.

You have the right to lodge a complaint with a supervisory authority that has jurisdiction over issues related to the PIPEDA.

The Company requires only the information that is reasonably required to enter into a contract with you. The Company will not require you to provide consent for any unnecessary processing as a condition of entering into a contract with the Company.

## **17. LOCATION AND STORAGE DURATION OF YOUR PERSONAL INFORMATION**

The Company retains Personal Information for as long as necessary to provide you with the Service, to perform the Company’s marketing campaigns effectively or as permitted or required by applicable laws, whichever is longer. If you wish to have all your Personal Information removed, you can do so by deleting your account through the account settings page. However, please be aware that this action is irreversible, and you will lose access to the Service and your Personal Information, with no possibility of logging in again or using the Service.

The Company’s advertising partners may retain your Personal Information for a period of approximately **18 to 24 months**. But you do have an option to opt-in/opt-out of the personalized ads which you can set from the account settings page.

Google Analytics may keep your data for around **26 months**. To opt-out of this tracking, you will have to reach out to the Company at [privacy@ptw.com](mailto:privacy@ptw.com)

The Platform operates its service globally and collects and stores Personal Information on the cloud using AWS located in the United States in Northern Virginia. The Company may transfer your Personal Information to any country where the Company or its third parties, affiliates, subsidiaries, or service providers are located. Data protection laws in the United States or other countries may not be as recent and comprehensive as under the Canadian, the European Economic Area (EEA), Switzerland, and the U.K. As such, your personal data may be collected, used and disclosed outside of Canada, the EEA, Switzerland, and the UK by our service providers, such as in the United States.

## **18. UPDATES AND AMENDMENTS TO THIS PRIVACY POLICY**

The Company expressly reserves the right to update, amend, or otherwise modify this Privacy Policy at any time and from time to time, at the Company's sole discretion. The Company strongly encourages you to review the then-current version of this Privacy Policy whenever you choose to access and use the Service.

When any update, amendment, or other modification to this Privacy Policy is adopted by the Company, such modification will become effective as soon as it is published on the Website, unless otherwise distributed by another means of notification that the Company may elect to provide to you and other individuals and entities that are authorized to access and use the Service. The Company may also decide to communicate any update, amendment, or other modification to this Privacy Policy by means of the Service, or by such other means as may be determined by the Company, at its sole discretion. By submitting your Personal Information to us, by registering an account that authorizes you to access and use the Service, or by your decision to access and use the Service, and/or by voluntarily interacting with the Company's representatives after the Company publishes or otherwise provides notice regarding any update, amendment, or other modification to this Privacy Policy, you shall be deemed for all intents and purposes to have indicated and confirmed your unconditioned consent and express authorization for the Company to collect, store, use, and disclose your Personal Information in accordance with the terms and subject to the conditions set forth in the then-current version of this Privacy Policy.

## 19. CONTACT US

If you have any questions or concerns regarding the Company's Privacy Policy, including, for example, any questions regarding Privacy Notices or any other information referenced in [Section 13](#), above, you may contact us by email at [privacy@ptw.com](mailto:privacy@ptw.com), or by prepaid mail, addressed to:

Attention: DPO  
PTW America, Inc.  
1042 Princeton Drive  
Suite B  
Marina Del Rey, CA 90292 USA