



## Privacy Statement Overview

Your privacy is important to us, f(i) is committed to protecting the privacy of its users and the information that you share in connection with our services. Our Privacy Notice describes how we share and transfer Personal Data (defined in the Privacy Policy below) that you voluntarily provide, and our Privacy Policy provides a more detailed description of how we collect, process and manage your Personal Data and informs you of your rights with respect to the privacy practices associated with the use and disclosure of Personal Data through the website and our services. f(i) may provide additional notices through the website or services in addition to these practices or provide you additional choices about how f(i) may process your Personal Data. If you have any questions about this Privacy Notice or Privacy Policy (“Privacy Statement”), please contact us at [info@frostincluded.com](mailto:info@frostincluded.com).

## Privacy Notice

This Privacy Notice describes f(i)'s collection, use and disclosure of the information you provide to us through your use of the website or our services, as well as the rights you have with respect to your Personal Data. For any questions regarding this Privacy Notice please contact us at [info@frostincluded.com](mailto:info@frostincluded.com).

### I. What Information Do We Collect and How Do We Use It?

Information we collect from you:

- We will collect Personal Data that you voluntarily provide us, for example, when you register for our Newsletter. We may also collect Personal Data when you sign up for marketing emails, events, or other opportunities through f(i). Personal Data may contain your name, email, contact information, as well as job titles, or other information you provide to f(i).
- Billing and transactional information pursuant to your use of our services.
- Information regarding your use of the website or our services.
- Statistics and information on your use of the website and our services, including your broad geographic location and other technical data collected through cookies, pixel tags or other similar technologies.

Examples of how we use your Personal Data:

- To provide you with information regarding our services.
- To enhance the website and our services.
- To respond to your requests or to manage user accounts.
- To provide feedback and understand our users
- To monitor the security of the website.
- To provide you with promotional communications and materials.

Information from third party sources and affiliated companies.

We may also obtain information about you through third party sources as permitted by applicable law, such as public databases, social media platforms, and reseller, channel and joint marketing partners.



## II. Sharing Your Information

We may share Your Personal Data with third parties as follows:

Service Providers.

We may share your Personal Information with third parties, such as vendors and service providers who help with billing, payment processing, marketing, data analytics support and service associated with the Site or Service.

Business Partners.

We may share your Personal Data with our channel partners to fulfil obligations and requests, to deliver support and to provide users and our customer's users with information about f(i). f(i) does not control how a business partner may use your Personal Data. Our business partners are responsible for managing the use of Personal Data collected in these circumstances.

Compliance with laws and for other legitimate business purposes.

We may share your Personal Data when we believe disclosure is necessary or required by law, regulation, to protect users, the integrity of the website or to defend or exercise our legal rights. We may also disclose your Personal Data when it may be necessary for other legitimate purposes as reasonably determined by f(i).

## III. International Transfers of Information

Information, including information collected in the European Economic Area ("EEA") may be transferred, stored and processed by us and our services providers in the United States and other countries whose data protection laws may be different than the laws of your country. We will protect your Personal Data in accordance with this Privacy Notice wherever it is processed and take appropriate steps to protect the information in accordance with applicable laws.

## IV. Information Security and Confidentiality

f(i) maintains (and requires its subcontractors and service providers to maintain) appropriate organisational and technical measures designed to protect the security and confidentiality of any information we process. However, no organisational or technical measures can be 100% secure so you should take care when disclosing information online and act reasonably to protect yourself online.

## V. Privacy Rights

You may modify the information you have provided to f(i) at any time through your f(i) profile. You can also opt-out of receiving marketing communications, deactivate, or delete your account at any time.



## VI. Additional Rights for EEA users or similar international areas

If you live in the European Economic Area, or a similar international area, you may have additional privacy rights available to you under applicable laws. We will process your requests in accordance with applicable data protection laws. If you would like to exercise any of the rights below, please contact [info@frostincluded.com](mailto:info@frostincluded.com) so that we may consider your request in accordance with applicable law:

- Right not to provide or withdraw consent: You have the right not to provide or withdraw your consent at any time.
- Right of access: You may have the right to access the Personal Data that you provided Us.
- Right of erasure: You may have the right to the erasure of Personal Data that we hold about you.
- Right to object to processing: You may have the right to request that f(i) stops processing your Personal Data and/or to stop sending you marketing communications.
- Right to rectification: You may have the right to require us to correct any of your Personal Data.

## VII. Additional Information

### How long We retain Your information

We will retain personal information we collect from you for the period allowable by law and where we have a justifiable business need to do so, unless a longer period is required or permitted by law. You can request deletion of your Personal Data at any time and we will consider Your request in accordance with applicable law.

### External Links

The f(i) website may link to other websites or services. Other websites may also contain links to the f(i) website. f(i) does not control those websites or their privacy practices. The personal information you choose to give to such parties is not covered by this Privacy Notice or the f(i) Privacy Policy.

### Changes to this Privacy Notice

f(i) will review and update this Privacy Notice in response to changing legal, technical and business developments. Please review this Privacy Notice frequently to understand how f(i) is protecting your Personal Data.

### Data Protection Officer

F(i) has appointed a Data Protection Officer to ensure continued commitment to privacy and security practices. For further information please contact Us at: [info@frostincluded.com](mailto:info@frostincluded.com).



## Privacy Policy

This Privacy Policy describes in further detail f(i)'s collection, processing and treatment of your information, as well as the rights you have with respect to such information. This Privacy Policy will provide you with further technical information regarding the processing of your Personal Data described in the Privacy Notice.

If you have any questions or concerns or complaints about this Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us at: [info@frostincluded.com](mailto:info@frostincluded.com).

### I. User Consent

By submitting Personal Data through our website, you agree to the terms of this Privacy Policy, as well as our Privacy Notice and the Terms of Service and you expressly consent to the collection, use and disclosure of your Personal Data in accordance with the Privacy Policy, Privacy Notice, and Terms of Service. If you do not agree, you should discontinue use of our website.

### II. A Note About Children

We do not intentionally gather Personal Data from visitors who are under the age of 16. If a child under 16 submits Personal Data to f(i) and we learn that the Personal Data is the information of a child under 16, we will attempt to delete the information as soon as possible. If you believe that we might have any Personal Data from a child under 16, please contact us at [info@frostincluded.com](mailto:info@frostincluded.com).

### III. A Note to Users Outside of the United Kingdom

If you are a non-UK user of the website, by accessing the website and providing us with Personal Data, you acknowledge and agree that your Personal Data may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Data may be processed in a country, where laws regarding processing of Personal Data may be less stringent than the laws in your country. By providing your data, you consent to such transfer. For further information please consult Our Privacy Notice.

### IV. Types of Data We Collect

“Personal Data” means data that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data.

“Anonymous Data” means data that is not associated with or linked to your Personal Data; Anonymous Data does not, by itself, permit the identification of individual persons. We collect Personal Data and Anonymous Data, as described below.

### V. Information You Provide to Us

We may collect Personal Data from you, such as your first and last name, location, phone number, gender, e-mail and mailing addresses, professional title, company name, employment history, education history and personal summary when you register on our website or submit such Personal Data for the purposes of job applications.



We retain information on your behalf, such as files and messages that we exchange.

If you provide us with feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

When you provide content (text, images, photographs, messages, comments or any other kind of content that is not your e-mail address), the information contained in your message will be stored on our servers and f(i) employees will be able to see it, along with any other information that you choose to make public.

When you participate in one of our surveys, we may collect additional profile information.

Cookies. Like many online services, we use cookies to collect information. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive user experience. This type of information is collected to make our website more useful to you and to tailor the experience with us to meet your special interests and needs.

Flash LSOs. When we post videos, third parties may use local shared objects, known as “Flash Cookies,” to store your preferences for volume control or to personalize certain video features. Flash Cookies are different from browser Cookies because of the amount and type of data and how the data is stored. Cookie management tools provided by your browser will not remove Flash Cookies.

Google Analytics. We use Google Analytics to help analyse how users use our website. Google Analytics uses Cookies to collect information such as how often users visit the website, which pages they visit, and what other sites they used prior to coming to our website. We use the information we get from Google Analytics only to improve our website. Google Analytics collects only the IP address assigned to you on the date you visit the Site, rather than your name or other personally identifying information. We do not combine the information generated by Google Analytics with your Personal Data. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Site, the Cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

## VI Use of Your Personal Data

### (a) General Use

In general, Personal Data you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your Personal Data in the following ways:

- facilitate inclusion for our newsletter;
- identify you as a user of our services;
- provide improved quality of our services;
- send you administrative e-mail notifications, such as information about pending job offers, security or support and maintenance advisories;
- respond to your inquiries related to employment opportunities or other requests;
- make telephone calls to you, from time to time, as a part of secondary fraud protection or to solicit your feedback;



- send surveys, offers and other promotional materials related to our services and for other marketing purposes of f(i).

#### (b) User Testimonials and Feedback

We often receive testimonials and comments from users who have had positive experiences with our services. We occasionally publish such content. When we publish this content, we may identify our users by their first and last name and may also indicate their home city. We obtain the user's consent prior to posting his or her name along with the testimonial. We may post user feedback on the Site from time to time. We will share your feedback with your first name and last initial only. If we choose to post your first and last name along with your feedback, we will obtain your consent prior to posting. If you make any comments on a blog or forum associated with our services, you should be aware that you have no reasonable expectation of privacy and that any Personal Data you submit there can be read, collected, or used by other users of those forums, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in those blogs and forums.

#### (c) Creation of Anonymous Data

We may create Anonymous Data records from Personal Data by excluding information (such as your name) that makes the data personally identifiable to you. We use this Anonymous Data to analyse request and usage patterns so that we may enhance the content of our services and improve website navigation. We reserve the right to use Anonymous Data for any purpose and disclose Anonymous Data to third parties in our sole discretion.

## VII Disclosure of Your Personal Data

We disclose Your Personal Data as described below and as described elsewhere in this Privacy Statement.

#### (a) Third Party Service Providers

We may share your Personal Data with third party service providers to: provide you with the f(i) services; to conduct quality assurance testing; to facilitate creation of accounts; to provide technical support; and/or to provide other services. These third-party service providers are required not to use Your Personal Data other than to provide the services requested by f(i).

#### (b) Affiliates

We may share some or all your Personal Data with subsidiaries, joint ventures, or other companies under a common control ("Affiliates"), in which case we will require our Affiliates to honour this Privacy Statement.

#### (c) Corporate Restructuring



We may share some or all your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

#### (d) Other Disclosures

Regardless of any choices you make regarding your Personal Data (as described below), f(i) may disclose Personal Data if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on f(i); (c) to protect or defend the rights or property of f(i) or users of the Site or our services; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

### VIII Third Party Websites

Our website may contain links to third party websites. When you click on a link to any other website or location, you will leave our website and go to another site, and another entity may collect Personal Data or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your Personal Data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our recommendation of such third parties or their products, content or websites.

### IX Your Choices Regarding Information

You have several choices regarding the use of information with our services:

#### (a) Email Communications

We will periodically send you free newsletters and e-mails that directly promote the use of our services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you Service related communications, including notices of any updates to Our Terms of Use or Privacy Policy.

#### (b) Cookies

If you decide at any time that you no longer wish to accept Cookies from our Site for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser’s technical information. If you do not accept Cookies, however, you may not be able to use all portions of the Site. If you have any questions about how to disable or modify Cookies, please let us know at the contact information provided below.



### (c) Changing or Deleting Your Personal Data

You may change any of your Personal Data held by f(i) by sending an e-mail to us at [info@frostincluded.com](mailto:info@frostincluded.com). You may request deletion of your Personal Data by us, and we will use commercially reasonable efforts to honour your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time), in which case we will comply with your deletion request only after we have fulfilled such requirements. We may also retain your information for fraud or similar purposes.

## X Security of Your Personal Data

f(i) is committed to protecting the security of your Personal Data. we use a variety of industry-standard security technologies and procedures to help protect your Personal Data from unauthorised access, use, or disclosure. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, whilst f(i) uses reasonable efforts to protect your Personal Data, F(i) cannot guarantee its absolute security.

## XI Changes to This Privacy Policy

This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to Our Privacy Policy by posting the new Privacy Policy on our website and we will change the “Last Updated” date above. You should consult this Privacy Policy regularly for any changes. Continued use of our services following posting of such changes, shall indicate your acknowledgement of such changes and agreement to be bound by the terms of such changes. If you do not agree, you should immediately discontinue your use of the Site or our services.