

Privacy Policy

We at Simply Mustard (“Simply Mustard”, “we”, “us”) respect your privacy and want you to understand how we collect, use, and share data about you. This Privacy Policy covers our data collection practices and describes your rights to access, correct, or restrict our use of your personal data.

Unless we link to a different policy or state otherwise, this Privacy Policy applies when you visit or use the Simply Mustard website, APIs or related services (the “Services”).

By using the Services, you agree to the terms of this Privacy Policy. You shouldn’t use the Services if you don’t agree with this Privacy Policy or any other agreement that governs your use of the Services.

Table of Contents

PRIVACY POLICY	1
1. WHAT DATA WE GET.....	2
1.1 Data You Provide to Us.....	2
1.2 Data We Collect through Automated Means	2
1.2.1 System Data: Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, browser, browser language, domain and other systems data, and platform types (“ System Data ”).	2
1.2.2 Usage Data: Usage statistics about your interactions with the Services, including assessments accessed, time spent on pages or the Service, pages visited, features used, your search queries, click data, date and time, and other data regarding your use of the Services (“ Usage Data ”).	3
1.2.3 Approximate Geographic Data: An approximate geographic location, including information like country, city, and geographic coordinates, calculated based on your IP address.	3
2. HOW WE GET DATA ABOUT YOU.....	3
2.1 Cookies and Data Collection Tools	3
2.2 Analytics	3
2.3 Online Advertising	3
3. WHAT WE USE YOUR DATA FOR.....	4
4. WHO WE SHARE YOUR DATA WITH.....	4
5. SECURITY.....	5
6. YOUR RIGHTS	6
6.1 Your Choices About the Use of Your Data	6
6.2 Accessing, Updating, and Deleting Your Personal Data	6
7. UPDATES & CONTACT INFO.....	8
7.1 Modifications to This Privacy Policy	8
7.2 Interpretation	8
7.3 Questions	8
COOKIE POLICY	8

1. What Data We Get

We collect certain data from you directly, like information you enter yourself, data about your participation in assessments, and data from third-party platforms that you connect with Simply Mustard. We also collect some data automatically, like information about your device and what parts of our Services you interact with or spend time using.

1.1 Data You Provide to Us

We may collect different data from or about you depending on how you use the Services. Below are some examples to help you better understand the data we collect.

When you create an account and use the Services, including through a third-party platform, we collect any data you provide directly, including:

- 1.1.1 **Account Data:** In order to use certain features (like enrolling in an assessment), you need to create a user account. When you create or update your account, we collect and store the data you provide, like your name, Company name, address, Country, company size, email address, password, phone number, gender, race, government ID information, home language and, date of birth, and assign you a unique identifying number (“**Account Data**”).
- 1.1.2 **Profile Data:** Profile data consists of name, surname, identification information (ID number, passport or drivers licence), e-mail address, mobile number, race, gender, home language and birth date.
- 1.1.3 **Promotions, and Surveys:** We may invite you to complete a survey or participate in a promotion, either through the Services or a third-party platform. If you participate, we will collect and store the data you provide as part of participating, such as your name, email address, date of birth, or phone number. That data is subject to this Privacy Policy unless otherwise stated in the official rules of the promotion or in another privacy policy. The data collected will be used to administer the promotion or survey, including for notifying winners and distributing rewards. To receive a reward, you may be required to allow us to post some of your information publicly (like on a winner’s page). Where we use a third-party platform to administer a survey or promotion, the third party’s privacy policy will apply.
- 1.1.4 **Communications and Support:** If you contact us for support or to report a problem or concern (regardless of whether you have created an account), we collect and store your contact information, messages, and other data about you like your name, Company and email address. We use this data to respond to you and research your question or concern, in accordance with this Privacy Policy.

The data listed above is stored by us and associated with your account.

1.2 Data We Collect through Automated Means

- 1.2.1 **System Data:** Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, browser,

browser language, domain and other systems data, and platform types (“**System Data**”).

- 1.2.2 **Usage Data:** Usage statistics about your interactions with the Services, including assessments accessed, time spent on pages or the Service, pages visited, features used, your search queries, click data, date and time, and other data regarding your use of the Services (“**Usage Data**”).
- 1.2.3 **Approximate Geographic Data:** An approximate geographic location, including information like country, city, and geographic coordinates, calculated based on your IP address.

When you access the Services (including browsing assessments), we may collect certain data by automated means.

The data listed above is collected through the use of server log files and tracking technologies, as detailed in the “Cookies and Data Collection Tools” section below. It is stored by us and may be associated with your account.

2. How We Get Data About You

We use tools like cookies, web beacons and analytics services, to gather the data listed above. Some of these tools offer you the ability to opt out of data collection.

2.1 Cookies and Data Collection Tools

As detailed in our Cookie Policy, described in section 9, Simply Mustard and service providers acting on our behalf use server log files and automated data collection tools like cookies, tags, scripts, customised links, device or browser fingerprints, and web beacons (together, “**Data Collection Tools**”) when you access and use the Services. These Data Collection Tools automatically track and collect certain System Data and Usage Data (as detailed in Section 1) when you use the Services. In some cases, we tie data gathered through those Data Collection Tools to other data that we collect as described in this Privacy Policy.

2.2 Analytics

We use third-party browser and mobile analytics services on the Services. These services use Data Collection Tools to help us analyse your use of the Services, including information like the third-party website you arrive from, how often you visit, events within the Services, usage and performance data. We use this data to improve the Services, better understand how the Services perform on different devices, for support and to provide information that may be of interest to you.

2.3 Online Advertising

We use third-party advertising services like Facebook, LinkedIn, Google’s ad services, and other ad networks and ad servers to deliver advertising about our Services on other websites and applications you use. The ads may be based on things we know about you, like your Usage Data and System Data (as detailed in Section 1), and things that these ad service providers know about you based on their tracking data. The ads can be based on your

recent activity or activity over time and across other sites and services, and may be tailored to your interests.

Depending on the types of advertising services we use, they may place cookies or other tracking technologies on your computer, phone, or other device to collect data about your use of our Services, and may access those tracking technologies in order to serve these tailored advertisements to you. To help deliver tailored advertising, we may provide these service providers with a hashed, anonymised version of your email address (in a non-human-readable form) and content that you share publicly on the Services.

3. What We Use Your Data For

We use your data to do things like provide our Services, communicate with you, troubleshoot issues, secure against fraud and abuse, improve and update our Services, analyse how people use our Services, and as required by law or necessary for safety and integrity.

We use the data we collect through your use of the Services to:

Provide and administer the Services, including to display customised content and facilitate communication with other users;

- 3.1 Process your requests and orders for assessments, products, specific services, information, or features;
- 3.2 Communicate with you about your account by:
 - 3.2.1 Responding to your questions and concerns;
 - 3.2.2 Sending you administrative messages and information, notifications about changes to our Service, and updates to our agreements;
 - 3.2.3 Sending you information, such as by email or text messages, about your progress in assessments.
- 3.3 Manage your account preferences;
- 3.4 Facilitate the Services' technical functioning, including troubleshooting and resolving issues, securing the Services, and preventing fraud and abuse;
- 3.5 Solicit feedback from users;
- 3.6 Market and administer surveys and promotions administered or sponsored by Simply Mustard;
- 3.7 Learn more about you by linking your data with additional data through third-party data providers or analysing the data with the help of analytics service providers;
- 3.8 Identify unique users across devices;
- 3.9 Improve our Services and develop new products, services, and features;
- 3.10 Analyse trends and traffic, track purchases, and track usage data;
- 3.11 As required or permitted by law; or
- 3.12 As we, in our sole discretion, otherwise determine to be necessary to ensure the safety or integrity of our users, employees, third parties, the public, or our Services.

4. Who We Share Your Data With

We share certain data about you with companies performing services for us, Simply Mustard affiliates and our business partners. We may also share your data as needed for

security, legal compliance, or as part of a corporate restructuring. Lastly, we can share data in other ways if it is aggregated or de-identified or if we get your consent.

We may share your data with third parties under the following circumstances or as otherwise described in this Privacy Policy:

4.1 With Service Providers, Contractors, and Agents: We share your data with third-party companies who perform services on our behalf, like payment processing, fraud and abuse prevention, data analysis, email and hosting services, and customer services and support. These service providers may access your personal data and are required to use it solely as we direct, to provide our requested service.

4.2 With Simply Mustard Affiliates: We may share your data within our corporate family of companies that are related by common ownership or control to enable or support us in providing the Services.

4.3 With Analytics and Data Enrichment Services: As part of our use of third-party analytics tools, we share certain de-identified data as needed. De-identified data means data where we've removed things like your name and email address and replaced it with a token ID. We do this to manage application error tracking.

4.4 For Security and Legal Compliance: We may disclose your data to third parties if we (in our sole discretion) have a good faith belief that the disclosure is:

4.4.1 Permitted or required by law;

4.4.2 Requested as part of a judicial, governmental, or legal inquiry, order, or proceeding;

4.4.3 Reasonably necessary as part of a valid subpoena, warrant, or other legally-valid request;

4.4.4 Reasonably necessary to enforce our Terms of Use, Privacy Policy, and other legal agreements;

4.4.5 Required to detect, prevent, or address fraud, abuse, misuse, potential violations of law (or rule or regulation), or security or technical issues; or

4.4.6 Reasonably necessary in our discretion to protect against imminent harm to the rights, property, or safety of Simply Mustard, our users, employees, members of the public, or our Services.

4.4.7 We may also disclose data about you to our auditors and legal advisors in order to assess our disclosure obligations and rights under this Privacy Policy.

4.5 During a Change in Control: If Simply Mustard undergoes a business transaction like a merger, acquisition, corporate divestiture, or dissolution (including bankruptcy), or a sale of all or some of its assets, we may share, disclose, or transfer all of your data to the successor organisation during such transition or in contemplation of a transition (including during due diligence).

4.6 After Aggregation/De-identification: we can disclose or use aggregate or de-identified data for any purpose.

4.7 With Your Permission: With your consent, we may share data to third parties outside the scope of this Privacy Policy.

5. Security

We use appropriate security based on the type and sensitivity of data being stored. As with any internet-enabled system, there is always a risk of unauthorised access, so it's important to protect your password and to contact us if you suspect any unauthorised access to your account.

Simply Mustard takes appropriate security measures to protect against unauthorised access, alteration, disclosure, or destruction of your personal data that we collect and store. These measures vary based on the type and sensitivity of the data. Unfortunately, however, no system can be 100% secured, so we cannot guarantee that communications between you and Simply Mustard, the Services, or any information provided to us in connection with the data we collect through the Services will be free from unauthorised access by third parties. Your password is an important part of our security system, and it is your responsibility to protect it. You should not share your password with any third party, and if you believe your password or account has been compromised, you should change it immediately and contact our Support Team with any concerns. You can contact our support team at support@simplymustard.com

6. Your Rights

You have certain rights around the use of your data, including the ability to opt out of promotional emails, cookies, and collection of your data by certain analytics providers. You can update or terminate your account from within our Services, and can also contact us for individual rights requests about your personal data.

6.1 Your Choices About the Use of Your Data

You can choose not to provide certain data to us, but you may not be able to use certain features of the Services.

6.1.1 We will send you transactional and relationship messages regarding the Services, including administrative confirmations, order confirmations, important updates about the Services, and notices about our policies.

6.1.2 The browser or device you use may allow you to control cookies and other types of local data storage. Your wireless device may also allow you to control whether location or other data is collected and shared.

If you have any questions about your data, our use of it, or your rights, contact us at support@simplymustard.com

6.2 Accessing, Updating, and Deleting Your Personal Data

You can access and update your personal data that Simply Mustard collects and maintains as follows:

6.2.1 To update data you provide directly, log into your account and update your account at any time.

6.2.2 To terminate your account:

6.2.2.1 For requests to terminate an account please contact our support team at support@simplymustard.com

6.2.2.2 Please note: even after your account is terminated, some or all of your data may still be visible to others, including without limitation any data that has been (a) copied, stored, or disseminated by other users (including in assessment comment); (b) shared or disseminated by you or others (including in your shared content); or (c) posted to a third-party platform. Even after your account is terminated, we retain your data for as long as we have a legitimate purpose to do so (and in accordance

with applicable law), including to assist with legal obligations, resolve disputes, and enforce our agreements. We may retain and disclose such data pursuant to this Privacy Policy after your account has been terminated.

6.2.2.3 To request to access, correct, or delete your personal data, you can submit these requests by emailing support@simplymustard.com or writing to us at Simply Mustard, Attn: Privacy/Legal Team, The Barn, 6, Coldharbour Lane, Hildenborough Kent TN11 9JT England. Please allow up to 30 days for a response. For your protection, we may require that the request be sent through the email address associated with your account, and we may need to verify your identity before implementing your request. Please note that we retain certain data where we have a lawful basis to do so, including for mandatory record-keeping and to complete transactions.

6.3 Simply Mustard provides the following access to the data that we hold about you:

6.3.1 “Right to Know” — You have the right to request to know more about the categories and specific pieces of personal information that we have collected about you and access a copy of your personal information.

6.3.2 “Right to Deletion” — You have the right to request deletion of personal information that we have collected about you.

6.3.3 “Right to Non-Discrimination” — If you choose to exercise any of your rights, Simply Mustard will treat you like all other users.

6.3.4 “Right to request certain details about what personal information we share with third parties” for those third parties’ direct marketing purposes.

6.3.5 “Right to be forgotten” — You have the right to request that your personal information collected by Simply Mustard, be forgotten.

To exercise any of these rights, please email support@simplymustard.com or write to us at Simply Mustard, and include your mailing address, residence, and email address. Attn: All Things Mustard, The Barn, 6 Coldharbour Lane, Hildenborough, Kent TN11 9JT England.

Simply Mustard does not sell your personal information or the personal information of any of our users.

Since the internet industry is still working on Do Not Track standards, solutions, and implementations, we do not currently recognise or respond to browser-initiated Do Not Track signals.

In order to provide the Services to you, we must transfer your data, process it and store it on servers located throughout the World, primarily in the United States and Europe. By visiting or using our Services, you consent to the transfer, storage, and processing of your data in and to the United States, Europe or other countries. You have the right to lodge a complaint with your data supervisory authority within your territory.

That data is also processed by our group companies, or our service providers, including to process transactions, facilitate payments, and provide support services as described in Section 4. We have entered into data processing agreements with our service providers that restrict and regulate their processing of your data on our behalf. By submitting your data or

using our Services, you consent to this transfer, storage, and processing by Simply Mustard and its processors anywhere in the World.

7. Updates & Contact Info

When we make a material change to this policy, we'll notify users via email, in-product notice, or another mechanism required by law. Changes become effective the day they're posted. Please contact us via email or postal mail with any questions, concerns, or disputes.

7.1 Modifications to This Privacy Policy

From time to time, we may update this Privacy Policy. If we make any material change to it, we will notify you via email, through a notification posted on the Services, or as required by applicable law. We will also include a summary of the key changes. Unless stated otherwise, modifications will become effective on the day they are posted.

As permitted by applicable law, if you continue to use the Services after the effective date of any change, then your access and/or use will be deemed an acceptance of (and agreement to follow and be bound by) the revised Privacy Policy. The revised Privacy Policy supersedes all previous Privacy Policies.

7.2 Interpretation

Any capitalised terms not defined in this policy are defined as specified in Simply Mustard Terms and Conditions. Any version of this Privacy Policy in a language other than English is provided for convenience. If there is any conflict with a non-English version, you agree that the English language version will control.

7.3 Questions

If you have any questions, concerns, or disputes regarding our Privacy Policy, please feel free to contact our privacy team (including our designated personal information protection manager) at support@simplymustard.com. You can also send postal mail to us at Simply Mustard, Attn: All Things Mustard, The Barn, 6 Coldharbour Lane, Hildenborough, Kent TN11 9JT England.

Cookie Policy

1. What are cookies?

Cookies are small text files stored by your browser as you browse the internet. They can be used to collect, store, and share data about your activities across websites, including on Simply Mustard. Cookies also allow us to remember things about your visits to Simply Mustard, like your preferred language, and to make the site easier to use. We also use web beacons (small objects that allow us to measure the actions of visitors and users using the Services) for things like identifying whether a page was visited, identifying whether an email was opened, and advertising more efficiently by excluding current users from certain promotional messages.

We use both session cookies, which expire after a short time or when you close your browser, and persistent cookies, which remain stored in your browser for a set period of time. We use session cookies to identify you during a single browsing session, like when you log into Simply Mustard. We use persistent cookies where we need to identify you over a longer period, like when you request that we keep you signed in.

2. Why does Simply Mustard use cookies and similar technologies?

We use cookies and similar technologies like web beacons and pixel tags, to deliver, measure, and improve our services in various ways. We use these cookies both when you visit our site and services through a browser. As we adopt additional technologies, we may also gather additional data through other methods.

3. We use cookies for the following purposes:

3.1 Authentication and security:

For example, cookies help authenticate your access to Simply Mustard and prevent unauthorised parties from accessing your accounts.

- To log you into Simply Mustard
- To protect your security
- To help detect and fight spam, abuse, and other activities that violate Simply Mustard's agreements

3.2 Functional:

Cookies that store functional settings (like the volume level you set for video playback).

3.3 Session State:

Session State cookies track your interactions with the Services to help us improve the Services and your browsing experience, remember your login details, and enable processing of your assessment purchases. These are strictly necessary for the Services to work properly, so if you disable them then certain functionalities will break or be unavailable.

3.4 Analytics and research:

For example, cookies help us test different versions of Simply Mustard to see which features or content users prefer, web beacons help us determine which email messages are opened, and cookies help us see how you interact with Simply Mustard, like the links you click on.

We also work with analytics partners, who use cookies and similar technologies to help us analyse how users use the Services, including by noting the sites from which you arrive. Those service providers may either collect that data themselves or we may disclose it to them.

You can opt out of some of these services through tools like the Google Analytics Opt-out Browser Add-on .

- To help us improve and understand how people use Simply Mustard

3.5 Personalised content:

For example, cookies help us show a personalised list of recommended assessments on the homepage

- To customise Simply Mustard with more relevant content

4. What are my privacy options?

You can set your web browser to alert you about attempts to place cookies on your computer, limit the types of cookies you allow, or refuse cookies altogether. If you do, you may not be able to use some or all features of the Services, and your experience may be different or less functional.

You have a number of options to control or limit how we and our partners use cookies:

4.1 Most browsers automatically accept cookies, but you can change your browser settings to decline cookies by consulting your browser's support articles. If you decide to decline cookies, please note that you may not be able to sign in, customise, or use some interactive features in the Services.

- For general information about targeting cookies and how to disable them, visit www.allaboutcookies.org.

5. Updates & Contact Info

From time to time, we may update this Cookie Policy. If we do, we'll notify you by posting the policy on our site with a new effective date. If we make any material changes, we'll take reasonable steps to notify you in advance of the planned change.

If you have any questions about our use of cookies, please email us at support@simplymustard.com