

Tenzing Privacy Policy

Tenzing Consulting (“Tenzing”, “We” or “Our”) understands that your privacy is important to you. We are committed to respecting your privacy and protecting your personal data. Your personal data is any information that can identify you as an individual person, collected when you use our Website or other digital platforms. We advise you to carefully read this Privacy Policy (“Policy”), so that you are aware of how, where, and why we are using your personal data.

PURPOSE

This Policy sets out the way in which we process your information when you use our Website or other digital platforms in accordance with the General Data Protection Regulation (GDPR).

APPLICABILITY

This Policy applies to individuals visiting our Website. The Policy applies only to the information we collect through our Website, in email, text and other electronic communication received through or in connection with our Website.

INFORMATION WE MAY PROCESS ("Personal Data")

We may collect your personal data including your email id, demographic information including country, postcode, first name, last name, job title, mobile number, social media profile, preferences and interests. We may also capture additional Personal data in the form of various usage and user metrics when you use our website including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behavior and usage information, feature use metrics and statistics, usage history, MAC Address, mobile unique device ID and other similar information. While some of this data is captured directly from you, for example, by way of web forms and web log servers, others can be captured indirectly from third parties, for example, tracing organization details, preferences and interests based on IP address and browsing history respectively.

MEANS OF PROCESSING DATA

- Cookies
- Weblogs
- Surveys
- Web forms
- Newsletter sign-ups
- Registration for an event/activity
- Information request mechanism

COOKIES

Cookies are alphanumeric identifiers with small amount of data that is commonly used as an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your computer’s hard drive. Please note, a cookie in no way gives us access to your computer. Our website uses these “cookies” to collect information and to improve our Service. You can accept the cookies to be

placed on your browser by clicking on the Accept button on our website. You can find out more about which cookies we are using or switch them off in settings.

If you select Accept, as mentioned above, at any time you also have the option to change/control your cookies through your browser settings.

GROUNDS FOR LAWFUL PROCESSING OF PERSONAL DATA

When we process your Personal data, we do so primarily in connection with the marketing, sales and promotion of services which we provide, or which are procured using our services, and to improve and enhance the range of those services and offerings. We may process your personal data in the following circumstances:

- when we process cookies, with your explicit consent; or
- when we process your personal data for communication, sales and marketing, registration and subscriptions purposes, where processing is necessary for pursuing our legitimate interests

USE OF PERSONAL DATA

We generally use the information to establish and enhance our relationship with our users for the following purposes:

- **Communication:** We may use your information to administer and provide services you request or have expressed an interest in, to communicate with you in case of customer support, to process transactions, for sending newsletters, updates and promotional materials, for seeking your opinion and feedback and personalize and/or tailor any communications that we may send you.
- **Advertising:** We may use your information to carry out advertising and market research based on behavioral metrics, geo-location data, demographic data and marketing preferences we capture. We may permit certain third-party companies to help us tailor advertising based on use.
- **Activity Tracking:** We may use your information to track your activity on our digital platforms and personalize and improve your experience. This can be used to create an individual profile for you so that we can understand and respect your preferences or for profiling purposes to enable us to personalize and/or tailor any marketing communications that you may consent to receive from us.
- **Optimization:** We may use your information to operate, improve and maintain our site, to prevent fraud and abuse.
- **Information Sharing:** We may use and share your information with third parties with whom we have contractual relationship. For example, we may provide you with a link where you may share your content with another person.

TRANSEFRRING YOUR PERSONAL DATA

As a global business, we may transfer your personal data to servers, entities and partners located outside EEA or other trusted third parties based in other countries so that they may process personal data on our behalf. By using our website and other digital platforms or otherwise providing us with your personal data, you agree to us doing so in accordance with the terms of this Privacy Policy and

applicable data protection laws and regulations. To ensure that your Personal data does receive an adequate level of protection when transferred outside EEA, we have executed Intercompany Transfer Agreements containing standard contractual clauses in accordance with the EU and data protection laws. We may also transfer your data to third party service providers and web analytics tool providers, such as Google Analytics, Double Click Cookies, Lead Forensics, Oracle Services, and Domo Services. Details regarding them can be accessed by clicking Google Analytics, Double Click Cookies, Lead Forensics, Oracle Services, and Domo Services. We may permit certain third-party companies to help Tenzing tailor the advertising that it thinks may be of interest to you, based on your use of our website.

DATA RETENTION

Tenzing retains personal data, as necessary, for the duration of the relevant business relationship. We may also retain personal data for longer than the duration of the business relationship should we need to retain it to protect ourselves against legal claims, use it for analysis or historical record-keeping, or comply with our information management policies and schedules. If you request that we delete your personal data, Tenzing will make reasonable attempts to delete all instances of the information in their entirety. For requests for access, corrections, or deletion, please refer to the “Your Privacy Rights” section of this Privacy Policy.

LINKING TO THIRD-PARTY WEBSITES

Tenzing may provide links to third-party websites or information as a service to our users. If you use these links, you will leave our website. Such links do not constitute or imply an endorsement, sponsorship, or recommendation by Tenzing of the third party, the third-party website, or the information contained therein, and Tenzing shall not be responsible or liable for your use thereof.

CHILDREN

Our Website and other digital platforms are not designed for or directed at children 13 years of age or younger, and Tenzing does not intentionally collect or maintain personal data about anyone under this age.

SECURITY

We have implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, alteration, or destruction. Only authorized Tenzing personnel and third-party service providers are provided access to personal data, and these employees and service providers are required to treat this information as confidential. Despite these precautions however, Tenzing cannot guarantee that unauthorized persons will not obtain access to your personal data.

YOUR PRIVACY RIGHTS

We will respect your legal rights in relation to your data. Below are the rights granted to you as per GDPR, and Tenzing is committed towards protection of the same:

- Right to be informed
- Right to access
- Right to rectification
- Right to erasure

- Right to restrict processing
- Right to data portability
- Right to object
- Right to withdraw consent

CONSENT; CHANGES TO PRIVACY POLICY

This Policy is effective as of May 25, 2018. By using our Website or our other digital platforms, you consent to the collection, use, and storage of your personal data by Tenzing in the manner described in this Privacy Policy and elsewhere on the Website. We reserve the right to make changes to this Privacy Policy from time to time. We will alert you to any such changes by updating this Privacy Policy. If we make material changes to this Privacy Policy that increase our rights to use personal data that we have previously collected about you, we will obtain your consent either through an email to your registered email address or by prominently posting information about the changes on our Website.

WHO TO CONTACT

In case you have any questions, comments or concerns about this Policy or wish to exercise any of the above-mentioned rights, you can contact privacy@tenzingconsulting.com.