

# CB Insights Privacy Statement

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CB Information Services, Inc. ("CB Insights," "CBI," "we," "us," or "our") believes in the importance of earning and maintaining your trust. As such, we are committed to protecting your privacy rights. This Privacy Statement ("Statement") provides notice of how CBI collects, uses, shares, or otherwise processes information relating to natural persons ("Personal Data"), and about how you may exercise your applicable rights regarding such Personal Data.

Certain portions of this Statement apply only to residents of the state of California, as set out later in this Statement.

## I. Scope and Applicability

This Statement applies to Personal Data processed by CBI when you:

- Visit this website ([www.cbinsights.com](http://www.cbinsights.com)) and/or any other CBI website(s) which reference or link to this Statement (collectively, "Website");
- Use, download, or access, as applicable, any of our various internet-based offerings, including any paid or non-paid subscriptions, newsletters, mobile applications, mobile platforms, webinars, briefings, programs, software, or applications (collectively, "Services");
- Apply for a job with us;
- Engage with CBI on or through social media sites;
- Communicate with us, including by email, phone, or other means
- Attend or register for any of our events, conferences, networking/community offerings, etc.; or
- Otherwise communicate or engage with us.

This Statement applies whether you have provided Personal Data to us directly or whether we have obtained Personal Data indirectly, including from a different source, such as a third party. This Statement may be supplemented by additional privacy notices provided to you.

Notwithstanding the foregoing, if you or your organization has previously entered into a separate, written agreement with CB Insights governing your existing use of the Services ("Subscriber Agreement"), any conflicting privacy terms of the Subscriber Agreement shall control as set forth therein.

It is important to understand that the Website and the Services may contain links to sites or offerings operated by individuals or entities other than CB Insights. Such links, where applicable, are provided for your reference and convenience only. CB Insights is not responsible for the content or operation of such sites or offerings, nor the security or privacy of any information collected by such third parties. You are solely responsible for determining the extent to which you may use any such content, and you should review the corresponding privacy policies applicable to these third-party sites or offerings.

This Statement does not apply to collection and use by CBI Customers of Personal Data of end users of such CBI Customers. End users of CBI Customers should refer to the privacy policy of their respective CBI Customer for relevant information.

## II. Information We Collect

We may collect certain Personal Data directly from you (e.g., via web forms you complete or products or Services you access, download, or otherwise obtain). Such information may include:

- Name, job title, job responsibilities, contact details, and company or organization;
- Your communications with CBI personnel;
- Content you post on our social media pages;
- Information you provide when using our products and services, such as your areas of focus and interests for your company or organization;
- Information you provide on the Website, such as online questionnaires, or feedback forms;
- Information you provide when you subscribe to email newsletters such as your interest in specific CBI research areas;
- Responses to surveys or other such best-practices studies;
- Information you provide when registering for a free trial account;
- Log-in credentials and information about your use of and preferences for the Services;
- Information provided or obtained in relation to a job application, including professional and education information; and
- Limited billing information, collected and used strictly for billing purposes only, is not shared or used for any other purposes, and is and will be processed in accordance with all applicable laws. To be clear, CBI almost never collects billing information from individuals, as typically our offerings are paid by your company or organization ("CBI Customer").

Other information may be obtained indirectly from you via your use of the Website or the Services. Such information may include:

- Information regarding usage of the Website or Services via web logs collected automatically and passively using various technologies, which may or may not specifically identify you or other individuals. Examples may include IP addresses, browser types, domain names, and other anonymous statistical data regarding aggregate usage;
- Activity on third party sites and applications that use our services;
- Download restrictions or other such consumption limits, where applicable, attributed to your CBI account, username, email address, registration, etc. Additionally, if you elect to download and use any optional third-party applications with the Services (for example, the CBI Chrome plugin), we will detect and store information necessary for you to effectively use the third-party application; and
- Information provided by your employer or organization, such as name, email, other contact information, job title, etc., in order to activate and manage your access to and use of the organization's subscription to the Services.

If you register for, or attend one of our events, conferences, networking/community offerings, we may:

- Scan an attendee badge or QR code, which will provide contact information such as your name, title, company name, and email address;
- Record or otherwise broadcast conference presentations or locations; and
- Collect information regarding dietary requirements or any reasonable accommodation needed to attend and enjoy the event.

In some cases, we may obtain personal data from external sources in accordance with applicable data protection laws. These sources may include:

- Public records and government databases
- Professional directories and registries
- Business partners, affiliates, and service providers
- Commercial and non-commercial data suppliers
- Publicly available websites and online media relevant to professional or business-related activities

The types of personal data collected from such sources are generally limited to business-related contact information, such as name, job title, company affiliation, and professional contact details. We do not collect sensitive personal data or use data from third-party platforms in ways that would violate their terms of use or applicable law.

Due to the wide variety and evolving nature of these external sources, it is not feasible to provide a complete list of all data providers individually. However, we assess the reliability of these sources and ensure that any personal data obtained is processed lawfully, fairly, and transparently, in accordance with applicable data protection regulations, including the General Data Protection Regulation (GDPR).

## III. Use of Cookies, Tracking Technologies, and other Electronic Tools

Cookies are data sets that are stored in the browser's database and are used to collect limited information about your online preferences and increase website efficiency. When you visit the Website, CBI or one of our authorized third parties may place a cookie on your browser and/or device. We also use web beacons in some email communications. CBI uses such cookies and other tracking technologies to manage your preferences, customize and deliver content and advertising, provide social media features, and examine usage information pertaining to Website visits.

We may use both "session cookies" (which disappear once the browser is closed or computer is turned off) and "persistent cookies" (which remain in operation until deleted). You may manage website cookies in your relevant browser settings or by adjusting your cookie preferences [here](#) or via the pop-up at the bottom of the Website, and you always have the choice to change these settings by accepting, rejecting, or deleting cookies. If you choose to change your settings, you may find that certain Website or Services functions and features will not work as intended.

The following describes how we may use different categories of cookies and similar technologies:

Required or essential cookies. These cookies are necessary for the Website's basic operations and there are no options to disable. For example, session cookies needed to transmit the Website, authentication cookies, and security cookies.

Social media cookies. These cookies allow users to share our Website or materials on social media sites. Because these cookies are not within our control, you should refer to each social media site's respective privacy policies to understand how they work.

Advertising cookies. These cookies track activity across websites in order to understand a viewer's interests, and to direct specific marketing to them. CB Insights may now or in the future elect to contract with third-party advertising networks that collect IP addresses and other information from web beacons on our websites, from emails and on third-party websites.

Analytics cookies. These cookies measure interactions and engagements with our Website and record information, such as page visits, time and approximate location of users, and user interactions with the Website, which allow us to better understand the use of our Website and make improvements.

Functional cookies. These cookies help us customize our website content based on a user's preferences. They remember the user's choices, their language, the country pages visited and any changes the user makes to text size or other parts of our website pages. The information these cookies collect may be anonymized and they cannot track browsing activity on other websites.

By using the Services, we may also receive certain third-party cookies located on your computer or device. Third party cookies are those placed by websites, services, and/or parties other than CB Insights. Third party cookies may be used within the Services.

We use the service Google Analytics of the provider Google LLC with business address of 1600 Amphitheater Parkway, Mountain View, CA 94043 (hereinafter "Google") to collect and analyze the behavior of visitors to our website. For this purpose, data is collected in the form of online identifiers, IP addresses, device information and information on interaction with our website. During your visit, personal data is processed not only by us, but also by Google. We have therefore signed a contract between independently responsible parties with Google. For more information on terms of use and data protection, please visit. <http://policies.google.com>. Google's DPA is available at <https://support.google.com/analytics/answer/3379636?hl=en>

## IV. Use of Personal Data and Lawful Basis

In accordance with applicable law, we rely on the following lawful bases in processing your Personal Data for the purposes set out below.

- Necessity to perform a contract with you or take steps at your request prior to entering into a contract;
- Necessity to comply with applicable laws, regulations, or legal process;
- Necessity for us or a third party to pursue a legitimate interest; and
- Explicit consent (where required under applicable law) to use your information (where we rely on your consent, you have the right to withdraw consent by contacting us as set forth below).

We have the following legitimate interests in processing your Personal Data:

- The improvement of our range of Service offerings;
- The protection of our systems against misuse;
- The creation of statistics; and
- The storage of our correspondence with you.

Such legal bases are identified for the following common instances:

Administering our Website and Providing Services: Personal Data is processed to perform our contractual obligations, where applicable. In instances where we have not entered into a contract with you, such processing is based on our legitimate interest to

manage and promote our business, operate and administer the Website, provide and improve the Services, and to provide requested content or materials (for example, when you request to download one of our reports from the Website or Services).

Developing and Optimizing the Performance of the Services: Personal Data is processed to develop services and ensure that the services are performing in line with customer expectations.

To Display Personalized Content to You: We process your Personal Data to provide personalized information about us on and off our websites and to provide other personalized content based upon your activities and interests.

Provide Personalized Interactions: We process Personal Data to customized our interactions with you.

Customer Registration: In accordance with our contractual obligations or legitimate interest to provide Services, when you register for an account with CBI (whether as a paying client or on a complimentary basis), we may process your Personal Data as needed to register and administer your account, provide technical and client support and training, verify your identity, and send important account, subscription, and Services information.

Support Requests: If you request that CBI contacts you (for example, for free trial access or to learn about our offerings), or if you contact us by other means, we process your Personal Data to the extent it is necessary for our legitimate interest in fulfilling your requests and communicating with you, or as is required by contractual obligations.

Recruiting and Job Applications: We may use Personal Data for talent acquisition and/or job application evaluation, selection, and processing.

Compliance; Security and Functionality of Website and Services: We process your Personal Data by tracking your use of the Website and Services, to perform our contractual obligations, where applicable, to provide a secure and functional experience. In instances where we have not entered into a contract with you, such processing is based on our legitimate interest in promoting the safety and security of the Website, Services, systems and applications and in protecting our rights and the rights of others, whereby we reserve the right to monitor, investigate and report any attempts to breach the security of the Website or Services, verify accounts and activity, and enforce our terms and policies.

Event Registration and Attendance: We process your Personal Data to plan and host events, conferences, networking/community offerings for which you have registered or attend, including sending related communications to you, to perform on our contract with you, or to operate and improve our events business, enable peer networking opportunities, promote our brand, and collect relevant information for hospitality and health and safety purposes.

Developing Website and Services; Developing Offerings: We process your Personal Data to analyze trends, usage, and interactions with the Website and Services to the extent it is necessary for improving the Website and Services, developing new offerings, and providing individuals with tailored content and to personalize your experience with our Services. In certain instances, we will process your Personal Data for such development by directly seeking your input (for example, through surveys).

Improving Services and Offerings: We may process limited Personal Data of business professionals (more specifically, names, professional titles, professional experience, investment details, contact information and educational history) to improve our Services and offerings by increasing the data provided to our clients to meet their demands.

Identifying Client Interests and Opportunities: We may process your Personal Data to assess new potential customer opportunities as relevant in our provision of the Services to You.

Marketing Communications; Advertising. We will process your Personal Data by sending certain marketing information, product recommendations, custom research, and other communications (for example, newsletters, sales calls, or other electronic communications).

Payments: In the rare instances where you have provided financial information to us, CBI will process your Personal Data to verify such information and to collect payments solely as needed to complete a transaction and perform our contractual obligations.

Legal Obligations: We may be required to process Personal Data for legal and compliance reasons we believe to be necessary or appropriate under applicable law (which may include laws outside your country of residence). Such processing may be required to: respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities; enforce our terms of service or other terms and conditions; or protect our rights, privacy, safety, or property, or those of other persons.

## V. Disclosure of Personal Data

CBI may disclose Personal Data as follows:

Contracted Service Providers. As necessary to provide the Services, conduct our business operations, or when we believe that applicable law permits or requires disclosure, we may disclose Personal Data to contracted service providers, including entities which provide for hosting and system administration, payment processing, analytics, marketing, data enrichment, or client support. These service providers only receive Personal Data necessary to fulfill the services they provide to CBI. Under no circumstances are such service providers permitted to use Personal Data for any purpose other than to provide CBI with the designated services.

Your Employer or Organization. To the extent you are an authorized user of the Services or have otherwise registered for CBI offerings using your corporate email address, we may share Personal Data with your employer or organization to the extent necessary to provide you with access, verify accounts and activity, investigate suspicious activity, or enforce our terms and policies.

Event Sponsors. If you attend a CBI event, conferences, networking/community offerings, we may share limited Personal Data with certain event sponsors. If you do not wish for your information to be shared, you may choose not to participate in the event, may contact our events team as described in registration communications, or you may write to us as described below.

Advertising Network Partners. We may disclose information collected automatically and passively using various technologies through our Website to advertising partners to target you with advertising.

Public Forums: If any part of the Website or CBI branded social media sites permit public forum posting, the Personal Data you choose to post, share, upload, or make publicly available may be visible to others. You should never post or share any information that is confidential or about others unless you have permission to do so. We may use information you provide to personalize your experience and to make content recommendations.

Published Information: We may provide limited information of leadership teams and key personnel to other business professionals through our Services.

Legal and Compliance. We may disclose Personal Data to third parties in relation to compliance with laws, regulations, and legal processes.

## VI. Location of Processing

CB Insights is solely located in, and operates from, the United States. However, some of our service providers referenced above may process Personal Data outside your jurisdiction, and in countries that are not subject to an adequacy decision by the European Commission or your local legislature and/or regulator (India and Ukraine), and that may not provide the same level of data protection as your jurisdiction. For these processing activities, we ensure that Personal Data subject to transfers to third countries continues to be protected in a manner consistent with the standards of protection required under applicable law, for instance by entering into the appropriate standard contractual clauses for the transfer of data as approved by the European Commission (Art. 46 GDPR) and entering into contractual agreements with our service providers requiring compliance with applicable laws and regulations and restricting their access, use, and disclosure of Personal Data to align with our instructions.

## VII. Minors and Compliance with Children's Online Privacy Protection Act.

CBI's Services are solely intended for business clients and are not directed at minors. We do not knowingly collect Personal Data from children under the age of 16. If you are a parent or guardian and believe your child has provided us with Personal Data without your consent, please contact us as set forth below in Section XI, and we will take steps to delete such Personal Data from our systems.

## VIII. Retention Periods

CBI retains Personal Data for a period commensurate with the purpose for which the Personal Data was obtained. In addition, retention periods may be determined by other criteria, such as the nature and sensitivity of the Personal Data, including any potential risk of harm which could arise out of unauthorized use or disclosure, as well as whether additional legal/regulatory obligations require us to retain it.

## IX. Your Privacy Rights

Depending on the laws that apply to you, you may have certain rights regarding your Personal Data. These rights may include:

- Right to access your Personal Data. You may have the right to access Personal Data we maintain about you and, in most circumstances, to be provided with a copy of this information. You may also have the right to correct any inaccuracies relating to your Personal Data within our control.
- Right to restrict use. To the extent permitted by applicable law, you may have the right to restrict our processing of Personal Data.
- Right to deletion. You may have the right to request that we delete Personal Data we maintain about you. Please note, if you prefer to only opt-out of marketing communications, then we may retain your Personal Data with a strict "do not contact" mark applied, to ensure we do not contact you in the future for marketing purposes.
- Right to object to processing. Where we process your Personal Data on the basis of our legitimate interests or the legitimate interests of a third party (e.g., direct marketing purposes), you may have the right to object to such processing without having to provide any specific reason for such objection. Where required by applicable law, we will stop processing your Personal Data until we verify that we have compelling legitimate grounds for processing that outweigh your interests, rights, and freedoms, or in limited cases, where we need to continue processing the data for the establishment, exercise, or defense of legal claims.
- Right to withdraw consent. To the extent we base the processing of your Personal Data on your consent, you may have the right to withdraw consent without affecting the lawfulness of the processing based on such consent before its withdrawal.
- Right to data portability. In some instances, you may have the right to receive all Personal Data you have provided to us in a structured, commonly used, and machine-readable format and to transmit this data to another data controller, to the extent such transfer is technically feasible.

- Right to lodge a complaint with a supervisory authority. Provided you are in the UK or EU/EEA, you have the right to file a complaint regarding the processing of your Personal Data with the data protection authority (“DPA”) in the country where you reside, where you work, or where the alleged infringement of data protection laws has taken place. To file a complaint with the UK Information Commissioner’s Office, please click [here](#). For a list of DPAs within the EU/EEA, [please see this link](#). Other regulatory authorities may be relevant for individuals outside the EU/EEA.

#### How to exercise your rights

To exercise your rights, please contact us at [privacy@cbinsights.com](mailto:privacy@cbinsights.com). Any requests should include information to allow us to verify your identity (e.g., your name, address, email address, or other information reasonably required). If you are a California resident, please refer to Section X below for more detailed information on your rights under California law.

We respond to any legitimate requests within one month. In the event we require additional information, we will contact you and specify what is needed. In certain circumstances, it may take longer than one month, and we will notify you if additional time is needed, which may occur, for example if we receive overly complex or numerous requests or in the event we do not receive the required additional information.

Occasionally it may take us longer than a month, taking into account the complexity and number of requests we receive. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### Marketing Communication Preferences

Regarding electronic marketing communications, you may manage your receipt of the same by clicking on the “unsubscribe” or other equivalent link located on the bottom of any marketing or sales emails, visit the applicable email preference center, or contact us as described below in Section XI. As pertaining to sales calls, if you want your phone number to be added to our internal Do-Not-Call list, please contact us as described below in Section XI (please include your first name, last name, company and the phone number you wish to add to our Do-Not-Call list).

## X. California Privacy Notice

This California Privacy Notice (the “Notice”) supplements the information contained in the Statement and applies solely to residents of the State of California as defined by applicable law. For purposes of this Notice, “Personal Information” and “Sensitive Personal Information” shall have the meanings set forth in the California Consumer Privacy Act of 2018 (the “CCPA”), as amended by the California Privacy Rights Act (the “CPRA”), including any implementing regulations.

From you, directly or indirectly, or from third parties, we may collect (and may have collected in the preceding twelve (12) months), the following categories of Personal Information:

Category	Purposes
<b>Identifiers</b> such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers	All purposes described in Section IV



<p><b>Personal information described in subdivision (e) of Section 1798.80</b> (e.g., name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories)</p>	<p>Name, signature, address, and telephone number may be used for all purposes described in Section IV;</p> <p>Payment card number and bank account information may be used for providing our Services and payment; and</p> <p>Education, employment, and employment history may be used for recruiting and job application processing</p>
<p><b>Characteristics of protected classifications under California or federal law</b> (e.g., Age 40 years or older, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions, reproductive health decisions, sexual orientation, veteran or military status, genetic information (including familial genetic information)</p>	<p>Certain characteristics of protected classifications may be collected for compliance recordkeeping purposes related to recruiting and job application processing</p>
<p><b>Commercial information</b>, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<p>Sales and marketing; and advertising</p>
<p><b>Biometric information</b></p>	<p>Not collected</p>
<p><b>Internet or other electronic network activity information</b>, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement</p>	<p>Providing and administering our Website and Services; improving our Website, Services, and analytics; identifying client interests and opportunities; sales and marketing; and advertising</p>
<p><b>Sensory information</b>, such as audio, electronic, visual, thermal, olfactory, or similar information (e.g., recorded meetings and phone calls)</p>	<p>Providing and administering our Website and Services; improving our Website, Services, and analytics; identifying client interests and opportunities; and sales and marketing; conducting Services-related interviews</p>
<p><b>Professional or employment-related information</b></p>	<p>Recruiting and job application processing; and in relation to our Services</p>

<b>Education information</b> , defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)	Recruiting and job application processing
<b>Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer</b> reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Recruiting and job application processing; and sales and marketing; and in relation to our Services.
<b>Sensitive personal information</b>	Recruiting and job application processing

#### Categories of Sensitive Personal Information we collect

From you, directly or indirectly, or from third parties, we may collect (and may have collected in preceding twelve (12) months), the following categories of Sensitive Personal Information:

Category	Purposes
<b>Sensitive identifier</b> (e.g., social security, driver's license, state identification card, or passport number)	Employment records and payroll processing
<b>Account information</b> (e.g., account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account)	Not collected
<b>Precise geolocation</b> (within a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet)	Not collected
<b>Demographic information</b> (e.g., racial or ethnic origin, religious or philosophical beliefs, or union membership)	Recruiting and job application processing
<b>Communications content</b> (e.g., mail, email, and text messages unless the business is the intended recipient of the communication)	Not collected

<b>Genetic data</b>	Not collected
<b>Biometric information</b> processed for the purpose of unique identification	Not collected
<b>Personal information collected and analyzed concerning health</b>	Not collected
<b>Personal information collected and analyzed concerning sex life or sexual orientation</b>	Not collected

Categories of third parties to whom we disclose Personal Information

We may disclose Personal Information to third parties in accordance with the following:

<b>Category</b>	<b>Third Parties</b>
<b>Identifiers</b> such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers	Contracted service providers; event sponsors; mergers or acquisitions; advertising network partners; and legal and compliance
<b>Personal information described in subdivision (e) of Section 1798.80</b> (e.g., name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories)	Contracted service providers; mergers or acquisitions; and legal and compliance
<b>Characteristics of protected classifications under California or federal law</b> (e.g., Age 40 years or older, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions, reproductive health decisions, sexual orientation, veteran or	Contracted service providers; mergers or acquisitions; and legal and compliance

military status, genetic information (including familial genetic information)	
<b>Commercial information</b> , including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Contracted service providers; mergers or acquisitions; and legal and compliance
<b>Biometric information</b>	Not applicable
<b>Internet or other electronic network activity information</b> , including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement	Contracted service providers; event sponsors; mergers or acquisitions; advertising network partners; and legal and compliance
<b>Sensory information</b> , such as audio, electronic, visual, thermal, olfactory, or similar information (e.g., recorded meetings and phone calls)	Contracted service providers; mergers or acquisitions; and legal and compliance
<b>Professional or employment-related information</b>	Contracted service providers; mergers or acquisitions; and legal and compliance
<b>Education information</b> , defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)	Contracted service providers; mergers or acquisitions; and legal and compliance
<b>Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer</b> reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Contracted service providers; mergers or acquisitions; and legal and compliance
<b>Sensitive personal information</b>	Contracted service providers; mergers or acquisitions; and legal and compliance

#### Sale and Sharing of Personal Information

CBI may “sell” or “share,” (and may have sold or shared in the preceding twelve (12) months) Personal Information, including for the purposes of cross-context behavioral advertising, or used your Personal Information for targeted advertising and profiling. We may also have “sold” your Personal Information through our publishing of limited Personal Information of company leadership teams and key personnel as part of our Services (as described above).

To opt-out of the “sale” and “sharing” of your Personal Information, please write to us at [privacy@cbinsights.com](mailto:privacy@cbinsights.com) or [complete this web form](#).

#### Personal Information of Minors

We do not “sell” or “share” the Personal Information of minors under 16 years of age and have no actual knowledge of the collection of Personal Information of minors under 16 years of age.

#### Opt-out Preference Signals

We currently do not accept opt-out preference signals from any platform, technology, or mechanism (e.g., web browsers).

#### Your Rights and Choices

The CPRA provides California residents with specific rights regarding their Personal Information. This section describes your CPRA rights and explains how to exercise those rights.

- **Right to Know.** You may have the right to request access the specific pieces of Personal Information collected about you, the sources from which such information was obtained, the categories of information that have been sold or disclosed for a business purpose, and the commercial purpose for which the information was collected or sold, provided to you in a reasonably portable format.
- **Right to Deletion.** You have the right to request that we delete the Personal Information we have collected or maintain about you.
- **Right to Correction.** You have the right to request that we correct inaccuracies in the Personal Information we maintain about you.
- **Right to Opt-out of the Sale and Sharing of Personal Information.** You have a right to opt-out of the “sale” of your Personal Information the “sharing” of your Personal Information for purposes of cross-context behavioral advertising, and to opt-in again at your election.
- **Right to Limit the Use and Disclosure of Sensitive Personal Information.** You may have the right to request that we limit the use and disclosure of your Sensitive Personal Information.
- **Right to Restrict Profiling.** You may have the right to request that we restrict the use of your Personal Information for the purposes of profiling.
- **Right to Portability.** You may have the right to obtain a copy of certain Personal Information in portable (e.g., machine readable) format.
- **Right to Opt-out of Automated Decision-making.** You may have the right to opt-out of certain types of automated decision-making, subject to certain exceptions.
- **Right to Non-Discrimination.** You may have the right to not be discriminated against in the event you exercise your rights listed above. If you exercise such rights, you will not be denied goods or services, charged a higher rate, or provided with lower quality products.

#### *Exercising Your California Privacy Rights*

To exercise the rights described above, please submit a verifiable consumer request to us by either contacting us as described below or by [completing this web form](#).

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify your identity or that of an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

#### *Response Timing*

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## XI. Questions Regarding this Statement and Your Information

If you have any questions or comments regarding this Statement or your information, please contact us in writing at the following address:

CB Information Services, Inc.  
498 Seventh Avenue, 12th Floor  
New York, NY 10018  
Attn: Legal Department

In addition to writing at the above address, you can email us at [privacy@cbinsights.com](mailto:privacy@cbinsights.com).

You can also request that we review or update your preferences by emailing us at [privacy@cbinsights.com](mailto:privacy@cbinsights.com).

## XII. Security

We implement technical and organizational measures designed to ensure a level of security appropriate to the risk to the Personal Data we process. Taking into account the nature and scope of the Personal Data we process, these measures are aimed at ensuring the

confidentiality, integrity, and availability of Personal Data.

## XIII. International Data Transfers

As a company that primarily operates in the United States, please note that we may transfer your personal data outside of your country of origin if you are located outside of the United States. We will take steps to ensure that your data is subject to appropriate safeguards as required under this privacy notice, applicable data protection laws, contractual obligations with our Customers and, where applicable, appropriate legally recognized data transfer mechanisms, such as, for example, an Adequacy Decision granted to a non-European Union ("EU") country on the basis of article 45 of Regulation (EU) 2016/679 (list of countries that have been recognized as adequate [here](#); the Standard Contractual Clauses ("SCCs") as approved by the European Commission from time to time and, where applicable, the U.K. Addendum to such SCCs; or any other valid data transfer mechanism, issued or approved by the EEA, Swiss, or U.K. authorities such as the Data Privacy Framework ("DPF") Program.

As mentioned above, we use a limited number of third-party service providers to make our website and Services available that may access, process, or store personal data in the course of providing services. We currently maintain contracts with these third parties requiring their compliance with applicable laws and regulations and restricting their access, use and disclosure of personal data to align with our instructions. CB Insights is responsible for ensuring that these third parties are in compliance with having an approved and legally recognized data transfer mechanism in place and will be liable if a third party fails to meet the DPF Principles unless CB Insights can prove that it is not responsible for the event giving rise to the third-party's non-compliance.

CB Insights is subject to the investigatory and enforcement powers of the United States Federal Trade Commission regarding compliance with the DPF Program. In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF Principles, CB Insights commits to refer unresolved complaints about our collection or use of your personal data in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Any inquiries or complaints regarding our data privacy practices may be directed to our internal privacy team at [privacy@cbinsights.com](mailto:privacy@cbinsights.com) or to our GDPR Data Protection Officer prof. Dr. Christoph Bauer at GmbH at Buchardstraße 14, 20095 Hamburg. If you wish to communicate directly with our data protection officer (because you have a particularly sensitive matter for example), please contact them by post, as communication by e-mail could always have security gaps. Please state in your request that your concern relates to the CB Information Services, Inc. We will respond within thirty (30) days and provide appropriate recourse at no cost to you. If we fail to respond within that time, or if we have not addressed your DPF Principles-related complaint to your satisfaction, you may contact ICDR (the international division of the American Arbitration Association), an independent third-party dispute resolution mechanism based in the United States at [https://go.adr.org/dpf\\_irm.html](https://go.adr.org/dpf_irm.html) for more information or to file your complaint. If neither CB Insights nor the ICDR resolve your complaint, under certain conditions as outlined in Annex I to our DPF Principles [here](#), you may invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms; otherwise, you may also contact the appropriate data privacy authorities.

CB Insights' EU Representative for data processors not established in the European Union is ePrivacy Holding GmbH located at Burchardstraße 14 20095 Hamburg.

CB Insights complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the U.K. Extension to the EU-U.S. DPF as set forth by the U.S. Department of Commerce. CB Insights has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-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 the [Data Privacy Framework Website](#).

## XIV. Additional Mobile Considerations

In addition to the other terms in this Statement, if you use our mobile applications or access our mobile-optimized websites, we may receive information about your mobile device, including a unique identifier for your device. If you receive SMS messages from CB Insights, you may opt out by following the opt-out instructions that we provide or by contacting us at [privacy@cbinsights.com](mailto:privacy@cbinsights.com).

## XV. Brazil

If you are located in Brazil, this section provides additional disclosures required by Lei Geral de Proteção de Dados (LGPD).

**Legal Basis for Processing Personal Data.** As per LGPD Article 7, we process your Personal Data based on the following legal bases: with your consent, for the fulfillment of legal or regulatory obligations, where necessary for the performance of a contract or preliminary procedures related to the contract, and when necessary to meet our legitimate interests or a third party.

**Data Subject Rights.** Under the LGPD, you have specific rights regarding your Personal Data, similar to those under GDPR as outlined in Section 9 of this Statement. These include the right to confirm the existence of processing, access your personal data, correct incomplete, inaccurate, or outdated data, anonymize, block, or delete unnecessary or excessive data, portability, deletion of personal data processed with your consent, and the right to information about public and private entities with which we may share data. You also have the right not to give your consent and to revoke your consent. In such cases, we will inform you regarding the consequences of such revocation or refusal, which may include our inability to provide the Services to you.

Please refer to the Section 9 of this Statement for the procedures to exercise these rights.

## XVI. Canada

If you are located in Canada, please know that our Statement is designed in strict adherence with the Personal Information Protection and Electronic Documents Act (PIPEDA), guided by the 10 Fair Information Principles set out by the Office of the Privacy Commissioner of Canada. These principles shape our approach to accountability, transparency, consent, data collection and use, and security.

## XVII. Modifications to this Statement

CB Insights reserves the right to change this Statement at any time by posting revisions on the Website. Such changes will be effective upon posting and will modify the “Last Updated” date above. Where required by applicable law, we will obtain your consent prior to making material changes to the way your Personal Data is processed. We encourage you to regularly review this Statement to stay informed about our processing of your Personal Data.