

Dear Client

Rhetorik is committed to respecting everyone's privacy and our services are designed in accordance with the California Consumer Privacy Act (CCPA), the EU General Data Protection Regulations 2016 (GDPR), the UK Data Protection Act 2018 and other applicable data protection laws.

As part of our rigorous approach to data protection and data privacy, Rhetorik has completed a thorough review of its processes and practices to ensure compliance with all relevant legislation. This document lays out Rhetorik's NetFinder data processes and aims to confirm that they conform with all existing data protection laws and guidelines.

1. Summary of our approach

We take the following steps to comply with all existing data protection regulations and guidelines:

- We regularly review all applicable and enforceable data privacy and data protection regulations to check that we are compliant.
- We process typical business card information, as well as information made publicly available through online websites or social media and other professional information about specific corporate employees who have a direct link to technology priorities, decision making, implementations and usage (Personal Information).
- We limit the processing of personal data to what is necessary for this purpose.
- We rely on the lawful ground of "*legitimate interests*" to process personal data. In doing so, we have determined that the privacy rights of the individual have not been disproportionately affected.
- We provide clear definitions of how personal data will be used across all use cases.
- We provide a simple and clear route for individuals to remove permission to process their data.
- We host our data securely in accordance with industry best practices such as data encryption, access control.
- We track user preferences for contact methods and ensure that these are respected while the data is in our sole control.
- We ensure that our clients understand how the data we provide should be used so that they are compliant with existing user permissions.

2. Our service and data

Rhetorik's NetFinder is a database that supports our clients in understanding their existing clients' implementation of a range of technology assets and software, as well as identifying potential opportunities for new collaboration with prospective clients.

In order to deliver this service, we process details related to:

- Legal Entities details such as Corporate Business details – this includes business title, address location, revenues, number of employees, and core line of business.
- Corporate Business Employees – this includes employee name, surname, job title and email. The record also includes our understanding of job function and seniority.

The Legal Entities information we process is not Personal Data and is not protected by such data protection legislation. Nevertheless, Rhetorik applies the highest level of protection to all the data we process, whether it is personal or corporate data.

Personal Information supplied by Rhetorik can be used in 3 basic ways to support your sales, marketing, recruiting and analytics activities.

- a) **Keep your sales, marketing and recruiting data up-to-date:** this is a core requirement of the GDPR. By matching your existing database to Rhetorik data, you can: ensure that the Legal Entity details in your database are up to date; remove all closed or merged Legal Entities; and obtain new and updated Personal Information for the Legal Entities that are already part of your database
- b) **Engage with new contacts at existing accounts:** Rhetorik data support account-based marketing by providing Personal Information, Legal Entity and key technology information, enabling you to understand and market to your existing accounts more effectively. Subject to your internal Do Not Call verification protocols, all new Personal Information provided to you by Rhetorik within your existing accounts can be directly contacted via phone and post to provide relevant notice and marketing information. For “opt-out” countries, such as Finland, France, Ireland and the UK, business email addresses as listed in Rhetorik data may also be used for email marketing, subject to your own company’s suppression lists, data protection and data privacy policies and procedures.
- c) **Engage with new contacts at new accounts:** All data subjects listed in NetFinder are notified that their Personal Information is processed by Rhetorik and licensed to clients for sales, marketing and recruitment purposes. If they are decision makers, influencers or users for your technology, you are likely to have a legitimate interest in processing their personal data, and they are likely to have a reasonable expectation to receive relevant communications from you. You will need to notify them of your interest and ensure they can access, update or ask to delete the personal data you process, according to your own compliance Policies.

3. The Legislation that applies to us

Our approach to processing Personal Information conforms to the definition of Legitimate Interest as specified by Article 6 1(f) of the GDPR. The right to process data for the purpose of Direct Marketing is then further expanded in Recital 47 of the GDPR.

As part of our continuous assessment of the Personal Information we process in relations to key Decision Makers, Influencers and Users, we ensure that we balance the business case to process the Personal Information, such as job title and email address, against the privacy interests of the data subjects.

As a company, we are aware that rules around data privacy and compliance are constantly being updated. We therefore keep a close watch on when and how all applicable legislation will be introduced, updated or amended, both in the UK and internationally. By keeping ahead of these regulations and being compliant in advance, we believe our clients will be provided with more value based on the quality of our data and our compliance strategy.

We will review our data privacy and compliance processes regularly to check that we – and our customers – remain compliant over time.

4. Our key processes - following Data Privacy by Design

Under GDPR, data processors and controllers must follow a policy of Privacy by Design – ensuring that personal information is used only for specific and justified uses. Our approach to handling data ensures that only those with the right levels of permission can access data, and that only specific tasks can be undertaken.

5. Data Updates

Ensuring personal data are up-to-date and accurate is not only in line with GDPR requirements of accuracy under article 5.1(d), but also part of our long-established quality promise, to guarantee that information in our Database is valid and accurate at the highest industry level. Our processes to ensure accuracy include:

- Information on corporate details including address and number of employees is continuously checked and verified. Any relevant changes are updated monthly to our online platform.
- Information on technology deployments are being gathered continuously. Any relevant changes are uploaded monthly to our online platform.
- Information on corporate employees is reviewed bi-monthly, and data subjects are re-notified of our processing of their personal data on a 12-18 month cycle. Any relevant changes are uploaded weekly to our online platform.

6. Security

Our data is safely stored within a secure cloud hosting platform, hosted in the European Union.

Our clients are provided with unique passwords to access intelligence according to very specific categories and selections. This ensures that each individual customer requesting access can be tracked and access outside specific parameters or timescales can be denied.

All access to our data is encrypted so that the connection between our data and our customers is kept secure. In addition, identity management and access control policies are applied to ensure that unauthorised access is prohibited.

7. CTPS and Do Not Call Lists

We process matching to the Corporate Telephone Preference Service (CTPS) on a daily basis and this is refreshed into the online platform on a weekly basis.

We also encourage our clients to use our online platform to ensure that any changes in organizations' privacy preferences are correctly registered. This complements our own processes for checking preferences on contact methods and keeps them up to date.

All individuals about whom we hold Personal Information listed in NetFinder can exercise their right of access to their personal data as expressed in Article 15 by clicking on links within our notification emails, sending an email to privacy@rhetorik.com, making a request via our website form or by telephoning our Research Centre.

8. Notification at Source

As part of our data quality and acquisition process, we identify Personal Information of Corporate decision makers, influencers and users via direct telephone conversations, via company gate keepers such as reception or Human Resources, via validation of publicly available information on Corporate Websites and via partnership with suitable and guaranteed 3rd party providers.

As part of our compliance with the transparency mandated by the GDPR Articles 13 and 14, during the process of inclusion of Personal Information in a Corporate Legal Entity as listed in Netfinder, we provide a clear and specific notification of how business card information will be processed and used.

These details include how each name, surname, job title and email are collected, processed and presented to Rhetorik clients for their use.

This notification is supplied during each individual phone conversation and provided via email.

Our notice includes the following details:

- Rhetorik corporate information, including name and business practice

- Overview of Rhetorik clients and their business lines
- Link to where a copy of their data can be accessed, as well as any copy request or use of data objection can be presented

These notices and any relevant communications with the company and any of its decision makers, influencers and users are clearly recorded and accessible on request.

9. Using NetFinder Business Card Data

Rhetorik licenses NetFinder data to its customers, at which point the customer becomes a Data Controller in its own right. Each customer will need to ensure its own compliance with GDPR and other relevant legislation, have a lawful basis to rely on for the processing of personal data, and its own transparency notices. These will need to set out the Article 14 transparency information as the customer will have collected the personal data indirectly (i.e. from Rhetorik).

10. Conclusion

Rhetorik puts clear processes around appropriate and qualitative processing of data as a core competency for the business. By concentrating on clarity of practices and the quality of the data gathered, the company aims to provide customers with a valuable service.

As a company, we see the European Union's General Data Protection Regulation as an opportunity for our business to validate our processes and extend further our competitiveness in the space of data and intelligence and related marketing services.

It is understood that best practices and legislative restrictions in the B2B marketing space will be subject to further review by the European Commission and others, as well as by the Information Commissioner Officer in the UK. As any changes are made, we will comply with them.

We also work with our own clients to implement best practices for data management that will support and strengthen their own position in very competitive and growing markets. By collaborating with our clients, we can ensure that we remain compliant in how our data is handled and processed over time.

Links to relevant regulations and documents

- Text of the European Union's General Data Protection Regulation – <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32016R0679>
- Text of Information Commissioner's Office guidance on GDPR - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>
- Text of the DMA Guide to B2B Marketing and GDPR - <https://dma.org.uk/article/b2b-marketing-and-the-gdpr>
- Text of the Privacy and Electronic Communications Regulation - <http://www.legislation.gov.uk/uksi/2003/2426/contents/made>
- Text of Information Commissioner's Office guidance on Direct Marketing - <https://ico.org.uk/media/for-organisations/documents/1555/direct-marketing-guidance.pdf>