

Website Privacy Policy

Last Updated: March 7th 2025

Please click [here](#) to view the previous version of our Privacy Policy.

California residents: If you are a California resident, please see the **Notice to California residents** section below in addition to this Privacy Policy for information about your personal information and privacy rights.

European Users: Please see the **Notice to European Users** section below for additional information for individuals located in the European Economic Area or United Kingdom (which we refer to as “**Europe**”, and “**European**” should be understood accordingly).

This Website Privacy Policy describes how Cin7 Americas, Inc. and our subsidiaries and affiliates (collectively “**Cin7**,” “**we**,” “**us**” or “**our**”) processes personal information that we collect through our digital or online properties or services that link to this Website Privacy Policy (including as applicable, our website as well as in connection with our marketing activities, live events and other activities described in this Website Privacy Policy (collectively, the “**Service**”).

This Website Privacy Policy does not apply to any information that we process on behalf of our business customers (such as businesses and other organizations) while providing the Cin7 services to them and their employees. Our use of information that we process on behalf of our business customers is governed by our agreements with such customers. If you have concerns regarding your personal information that we process on behalf of a business customer, please direct your concerns to that enterprise customer.

Our websites, products, and services are designed for enterprise customers operating in their professional capacities. We do not offer products or services intended for use by individuals for their personal, family or household purposes. Accordingly, we treat all personal information we collect in connection with our website, marketing activities and live events as pertaining to individuals in their business capacities, or as representatives of the relevant enterprise, and not in their individual capacities.

You can download a printable copy of this Privacy Policy [here](#).

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, salutation, email address, mailing addresses, professional title and company name, and phone number.
- **Demographic data**, such as your city, state, country of residence, postal code, and age.
- **Event registration data**, such as your Contact data and any other information you provide when registering for a webinar or other event.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, communicate with us via chat features, social media, or otherwise.
- **Transactional data**, such as information relating to or needed to complete your orders on or through the Service, including order numbers and transaction history.
- **Payment data** needed to complete transactions, including payment card information or bank account number.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Private sources**, such as data providers, social media platforms, and data licensors.
- **Our affiliate partners**, such as our affiliate network provider and publishers, influencers, and promoters who participate in our paid affiliate programs.
- **Marketing partners**, such as joint marketing partners and event co-sponsors.
- **Other business partners**, such as professional solution providers.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages

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or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.

- **(Precise geolocation/Location) data** when you authorize the Service to access your device's location.
- **Communication interaction data** such as your interactions with our email, text or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

Cookies and similar technologies. Some of our automatic data collection is facilitated by the following technologies.

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users' web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a session ends, "persistent cookies" that remain longer, "first party" cookies that we place and "third party" cookies that our third-party business partners and service providers place.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

For more information, see our [Cookie Notice](#). We will also store a record of your preferences in respect of the use of these technologies in connection with the Service.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery and operations. We may use your personal information to:

- provide and operate the Service and our business;
- personalize the service, including remembering your selections and preferences as you navigate the Service;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services. As part of these activities, we may create aggregated, de-identified and/or anonymized data from personal information we collect. We make personal information into de-identified or anonymized data by removing information that makes the data personally identifiable to you. We may use this aggregated, de-identified or otherwise anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business and will not

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attempt to reidentify any such data.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.
- **Interest-based advertising.** Our third-party advertising partners may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms.
- **Testimonials.** With your consent, we may use your feedback to post comments about your experience with any Service on the website, in our marketing or promotional materials, to improve our Service.

Events, promotions and contests. We may use your personal information to:

- administer promotions and contests
- communicate with you about promotions or contests in which you participate
- contact or market to you after collecting your personal information at an event

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services. For example, we use Google Analytics, HubSpot Analytics, Fullstory and Hotjar for this purpose. You can learn more about Google Analytics and how to prevent the use of Google Analytics relating to your use of our sites here: <https://tools.google.com/dlpage/gaoptout?hl=en>. You can learn more about HubSpot Analytics, Fullstory and Hotjar through their respective privacy policy links below:

- Hubspot Analytics: <https://legal.hubspot.com/privacy-policy>
- Hotjar: <https://www.hotjar.com/legal/policies/privacy>
- Pendo: <https://www.pendo.io/legal/privacy-policy/>
- Qualified: <https://www.qualified.com/legal/privacy>
- Storylane: <https://www.storylane.io/privacy-policy>

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our

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internal policies;

- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

Further uses. We may use your personal information for further uses beyond those described above, in which case we will obtain your consent to that further use where required by applicable law (e.g., if the further use is not compatible with the initial purpose for which the personal information was collected).

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.

Affiliates. Our corporate parent, subsidiaries, and affiliates.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, marketing, consumer research and website analytics).

Payment processors. Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as Stripe. Stripe may use your payment data in accordance with its privacy policy, <https://stripe.com/privacy>.

Advertising partners. Third-party advertising companies for the interest-based advertising purposes described above.

Business and marketing partners. Third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the Compliance and protection purposes described above.

Business transferees. We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in Cin7, financing of Cin7, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Cin7 as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Your choices

In this section, we describe the rights and choices available to all users. Users who are located in California and Europe can find additional information about their rights below in the **Notice to California residents** and **Notice to European Users**, respectively.

Opt-out of communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-

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marketing emails.

Cookies. For information about cookies employed by the Service and how to control them, see our [Cookie Notice](#).

Blocking images/clear gifs: Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

settings.

Privacy settings. We make available certain privacy settings on the Service, including options to control [\[ADD\]](#).

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Delete your information. You can request that we delete your information by [contacting us](#).

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Users in Europe should read the important information provided below about transfer of personal information outside of Europe contained in the [Notice to European Users](#) below.

Children

The Service is not intended for use by anyone under 16 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through the Service from a child without the consent of the child’s parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

How to contact us

- **Email:** dataprivacy@cin7.com
- **Mail:** Cin7 Americas, Inc., 1675 Larimer Street #820, Denver CO 80202, United States
- **Web:** <https://help.cin7.com/>

Notice to California residents

This notice describes our collection, use, and disclosure of personal information of California residents in our capacity as a “business” under the California Consumer Privacy Act (“**CCPA**”) and their rights with respect to their personal information. For purposes of this notice, “personal information” and “sensitive personal information” have the meanings given in the CCPA but do not include information exempted from the scope of the CCPA.

Your privacy rights. As a California resident, you have the following rights under the CCPA:

- **Right to know.** You can request information about the categories of personal information that we have collected; the categories of sources from which we collected personal information; the business or commercial purpose for collecting, sharing and/or selling personal information; the categories of any personal information that we sold or disclosed for a business purpose; and the categories of any third parties with whom personal information was sold, shared or disclosed for a business purpose.
- **Right to access.** You can request a copy of certain personal information that we have collected about you.
- **Right to deletion.** You can request that we delete personal information that we collected from you.
- **Right to opt-out.** If we “sell” or “share” your personal information as defined by the CCPA, you can opt-out of those disclosures.
 - **Sharing.** Our use of the interest-based advertising services described above may constitute “sharing” of your personal information (including identifiers and internet/network information described in the CCPA) with our advertising partners from which you have the right to opt-out. You can request to opt-out of this sharing of your personal information by clicking the **Do Not Sell or Share My Personal Information** link in the footer of this webpage. Your request to opt-out will apply only to the browser and the device from which you submit the request.
 - **Sales.** We do not otherwise “sell” personal information as defined by the CCPA. Although our Service is not intended for children under 16 years of age, we are required to inform

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you that we do not have actual knowledge that we have sold or shared the personal information of children under 16.

- **Right to correction.** You can request that we correct inaccurate personal information that we have collected about you.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

How to exercise your rights. You may submit requests to exercise your right to know, access, deletion and correction to [[link to webform](#)] or via email to [[email for data requests](#)]. The rights described above are not absolute, and in certain cases, we may decline your request as permitted by law. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

Verification of identity; Authorized agents. We need to verify your identity to process your requests to exercise your rights to know, access, deletion, and correction, and we reserve the right to confirm your California residency. To verify your identity, we may require you to log into an online account if you have one, provide identifiers we can match against information we may have collected from you previously, confirm your request using the email or telephone account stated in the request, provide government identification, or provide a declaration under penalty of perjury, where permitted by law.

Your authorized agent may make a request on your behalf upon our verification of the agent's identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to applicable state law. If you have not provided your agent with such a power of attorney, we may ask you and/or your agent to take additional steps permitted by law to verify that your request is authorized, such as information required to verify your identity and that you have given the authorized agent permission to submit the request.

Information practices. The following describes our practices currently and during the past 12 months:

- **Sources and purposes.** We collect all categories of personal information from the sources and use them for the business/commercial purposes described above in the Privacy Policy.
- **Sensitive personal information.** We do not use or disclose sensitive personal information for purposes that California residents have a right to limit under the CCPA.
- **Retention.** The criteria for deciding how long to retain personal information is generally based on whether such period is sufficient to fulfill the purposes for which we collected it as described in this notice, including complying with our legal obligations.
- **Deidentification.** We do not attempt to reidentify deidentified information derived from personal information, except for the purpose of testing whether our deidentification processes comply with applicable law.
- **Collection and disclosure.** The chart below describes the personal information we collect by reference to the categories of personal information specified in the CCPA (Cal. Civ. Code §1798.140), and the categories of third parties to whom we disclose it. The terms in the chart refer to the categories of information and third parties described above in this Privacy Policy in more detail. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below. We may also disclose personal information to professional advisors, law enforcement and government authorities, and business transferees as described above in the How We Share your Personal Information section of this Privacy Policy.

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Statutory category/personal information we collect	Categories of third parties to whom we disclose the personal information for a business purpose	Categories of third parties to whom we “sell” or “share” personal information
<p>Identifiers</p> <ul style="list-style-type: none"> ● Contact data ● Demographic data ● Event registration data ● Communications data ● Transactional data ● Payment data ● Marketing data 	<ul style="list-style-type: none"> ● Affiliates ● Service providers ● Business and marketing partners 	<ul style="list-style-type: none"> ● Advertising partners (to facilitate online advertising) ● Business and marketing partners
<p>Identifiers (online)</p> <ul style="list-style-type: none"> ● Contact data ● Demographic data ● Event registration data ● Communications data ● Transactional data ● Payment data ● Marketing data ● Device data 	<ul style="list-style-type: none"> ● Affiliates ● Service providers ● Business and marketing partners 	<ul style="list-style-type: none"> ● Advertising partners (to facilitate online advertising) ● Business and marketing partners
<p>California Customer Records (as defined in California Civil Code §1798.80)</p> <ul style="list-style-type: none"> ● Contact data ● Demographic data ● Event registration data ● Communications data ● Transactional data ● Payment data 	<ul style="list-style-type: none"> ● Affiliates ● Service providers ● Business and marketing partners 	<ul style="list-style-type: none"> ● Advertising partners (to facilitate online advertising) ● Business and marketing partners

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<ul style="list-style-type: none"> ● Marketing data 		
<p>Commercial Information</p> <ul style="list-style-type: none"> ● Contact data ● Demographic data ● Event registration data ● Communications data ● Transactional data ● Payment data ● Marketing data ● Online activity data 	<ul style="list-style-type: none"> ● Affiliates ● Service providers ● Business and marketing partners 	<ul style="list-style-type: none"> ● Advertising partners (to facilitate online advertising) ● Business and marketing partners
<p>Internet or Network Information</p> <ul style="list-style-type: none"> ● Device data ● Online activity data ● Communications data ● Communication interaction data 	<ul style="list-style-type: none"> ● Affiliates ● Service providers ● Business and marketing partners 	<ul style="list-style-type: none"> ● Advertising partners (to facilitate online advertising) ● Business and marketing partners
<p>Inferences</p> <p>May be derived from:</p> <ul style="list-style-type: none"> ● Contact data ● Demographic data ● Event registration data ● Communications data ● Transactional data ● Online activity data ● Communication interaction data 	<ul style="list-style-type: none"> ● Affiliates ● Service providers ● Business and marketing partners 	<ul style="list-style-type: none"> ● Advertising partners (to facilitate online advertising) ● Business and marketing partners
<p>Financial Information</p> <ul style="list-style-type: none"> ● Transactional data 	<ul style="list-style-type: none"> ● Affiliates ● Service providers 	<ul style="list-style-type: none"> ● Business and marketing partners

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<ul style="list-style-type: none"> ● Payment data 	<ul style="list-style-type: none"> ● Payment processors ● Business and marketing partners 	
<p>Protected Classification Characteristics</p> <p>May be included or revealed in:</p> <ul style="list-style-type: none"> ● Contact data ● Demographic data 	<ul style="list-style-type: none"> ● Affiliates ● Service providers ● Business and marketing partners 	<ul style="list-style-type: none"> ● Advertising partners (to facilitate online advertising) ● Business and marketing partners

- **Shine the light law.** Under California’s Shine the Light law (California Civil Code Section 1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which they have disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for their own direct marketing purposes, and the categories of personal information disclosed. You may send us requests for this information to [EMAIL]. In your request, you must include the statement “Shine the Light Request,” and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

Notice to European users

General

Where this Notice to European users applies. The information provided in this ‘Notice to European users’ section applies only to individuals located in the European Economic Area (EEA) or United Kingdom (UK) (i.e., “Europe” as defined at the top of this Privacy Policy).

Personal information. References to “personal information” in this Privacy Policy should be understood to include a reference to “personal data” as defined in the “GDPR” (i.e., the General Data Protection Regulation 2016/679 (“EU GDPR”)) and the EU GDPR as it forms part of the laws of the United Kingdom (“UK GDPR”) Under the GDPR, “personal data” means information about individuals from which they are either directly identified or can be identified. The personal information that we collect from and about you is described in greater detail in the section “Personal Information we collect”.

Controller. Cin7 is the “controller” in respect of the processing of your personal information covered by this Privacy Policy for purposes of the GDPR. See the ‘How to contact us’ section above for our contact details.

Our GDPR Representatives. We have appointed the following representatives in the EU and UK as required by the GDPR – you can contact them directly should you wish:

- **UK General Data Protection Regulation (GDPR) - UK Representative:** Pursuant to Article 27 of the UK GDPR, Cin7 Americas Inc has appointed EDPO UK Ltd as its UK GDPR representative in the

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UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- by using EDPO’s online request form: <https://edpo.com/uk-gdpr-data-request/>
- by writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom
- **General Data Protection Regulation (GDPR) – European Representative:** Pursuant to Article 27 of the General Data Protection Regulation (GDPR), Cin7 Americas Inc has appointed European Data Protection Office (EDPO) as its GDPR Representative in the EU. You can contact EDPO regarding matters pertaining to the GDPR:
 - by using EDPO’s online request form: <https://edpo.com/gdpr-data-request/>
 - by writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium

Our legal bases for processing

In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a “legal basis” for that use.

Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to process your personal information in order to deliver the Service to you, or where you have asked us to take specific action which requires us to process your personal information (“**Contractual Necessity**”).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”). More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information for is set out in the table below.
- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the Purpose in question (“**Consent**”).

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your personal information – for more information on these Purposes and the data types involved, see the ‘How we use your personal information’ section above and the description of associated data sharing relevant to such purposes set out in the ‘How we share your personal information’ section also above.

Purpose	Categories of personal information involved	Legal basis
Service delivery and operations	<ul style="list-style-type: none">● Contact data● Demographic data● Event registration data● Communications data● Transactional data	<p><u>Delivery and operations</u></p> <ul style="list-style-type: none">● Contractual Necessity.● Legitimate Interests. We have a legitimate interest in ensuring the ongoing security and proper operation of our

Purpose	Categories of personal information involved	Legal basis
	<ul style="list-style-type: none"> ● Payment data ● Data from Third Party Services ● Device data 	<p>Service, our business and associated IT services, systems and networks.</p> <p><u>Personalization</u></p> <ul style="list-style-type: none"> ● Legitimate Interests. We have a legitimate interest in providing you with a good service via the Service, which is personalized to you and that remembers your selections and preferences. ● Consent, in respect of any optional processing relevant to personalization (including processing directly associated with any optional cookies used for this purpose).
Research and development	<ul style="list-style-type: none"> ● Any and all data types relevant in the circumstances 	<ul style="list-style-type: none"> ● Legitimate Interests. We have legitimate interest, and believe it is also in your interests, that we are able to take steps to ensure that our Service and how we use Personal Information is as un-privacy intrusive as possible.
Direct marketing	<ul style="list-style-type: none"> ● Contact data ● Demographic data ● Transactional data ● Marketing data 	<ul style="list-style-type: none"> ● Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organization and sending marketing communications for that purpose. ● Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.
Interest-based advertising	<ul style="list-style-type: none"> ● Device data ● Online activity data ● Location data 	<ul style="list-style-type: none"> ● Consent
Testimonials	<ul style="list-style-type: none"> ● Contact data ● Transactional data ● Communications data 	<ul style="list-style-type: none"> ● Consent
Events, promotions and	<ul style="list-style-type: none"> ● Contact data 	<ul style="list-style-type: none"> ● Contractual Necessity, to administer events, promotions and contests in accordance with the terms or rules thereof

Purpose	Categories of personal information involved	Legal basis
contests	<ul style="list-style-type: none"> ● Demographic data ● Event registration data ● Communications data ● Transactional data ● Marketing data 	<p>(including communicating with you as and where necessary).</p> <ul style="list-style-type: none"> ● In respect of promoting these events, promotions and contests: <ul style="list-style-type: none"> ● Legitimate Interests. We have a legitimate interest in promoting these events, promotions and contests, including associated publicizing of our business and operations. ● Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given promotional communications.
Service improvement and analytics	<ul style="list-style-type: none"> ● Contact data ● Demographic data ● Communications data ● Event registration data ● Transactional data ● Device data ● Online activity data ● Communication interaction data 	<ul style="list-style-type: none"> ● Legitimate Interests. We have a legitimate interest in providing you with a good service and analyzing how you use it so that we can improve it over time, as well as developing and growing our business. ● Consent, in respect of any optional cookies used for this purpose.
Compliance and protection	<ul style="list-style-type: none"> ● Any and all data types relevant in the circumstances 	<ul style="list-style-type: none"> ● Compliance with Law. ● Legitimate Interests. Where Compliance with Law is not applicable, we and any relevant third parties have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety.
Further uses	<ul style="list-style-type: none"> ● Any and all data types relevant in the circumstances 	<ul style="list-style-type: none"> ● The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the personal information was collected.

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Purpose	Categories of personal information involved	Legal basis
		<ul style="list-style-type: none">● Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.

Retention

We retain personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for the 'Compliance and protection' purposes outlined above.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information that we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

Other information

No obligation to provide personal information. You do not have to provide personal information to us. However, where we need to process your personal information either to comply with applicable law or to deliver our Service to you, and you fail to provide that personal information when requested, we may not be able to provide some or all of our Service to you. We will notify you if this is the case at the time.

No sensitive information. We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership, or biometric or genetics characteristic other than as requested by us as part of the Service) on or through the Service, or otherwise to us. If you provide us with any such sensitive personal information to us when you use the Service, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Service.

No automated decision-making and profiling. As part of the Service, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects. We provide our analysis to our business customers and our business customers make decisions that may affect you.

Security. We have put in place procedures designed to deal with breaches of personal information. In the event of such breaches, we have procedures in place to work with applicable regulators. In addition, in certain circumstances (including where we are legally required to do so), we may notify you of breaches affecting your personal information.

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Your additional rights

General. European data protection laws may give you certain rights regarding your personal information in certain circumstances. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no good reason for us continuing to process it - you also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Transfer.** Transfer to you or a third party of your choice a machine-readable copy of your personal information which you have provided to us.
- **Restrict.** Restrict the processing of your personal information, for example if you want us to establish its accuracy or the reason for processing it.
- **Object.** Object to our processing of your personal information where we are relying on Legitimate Interests – you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time.

Exercising These Rights. You may submit these requests by contacting us. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions. Typically, you will not have to pay a fee to exercise your rights; however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We try to respond to all legitimate requests within a month of receipt. It may take us longer than a month if your request is particularly complex or if you have made a number of requests; in this case, we will notify you and keep you updated.

Your Right to Lodge a Complaint with your Supervisory Authority. Although we urge you to contact us first to find a solution for any concern you may have, in addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

- *For users in the European Economic Area* – the contact information for the data protection regulator in your place of residence can be found here: https://edpb.europa.eu/about-edpb/board/members_en
- *For users in the UK* – the contact information for the UK data protection regulator can be found here: <https://ico.org.uk/make-a-complaint/>

Data Processing outside Europe

We are a U.S.-based company and many of our service providers, advisers, partners or other recipients of data are also based in the U.S. This means that, if you use the Service, your personal information will necessarily be accessed and processed in the U.S. It may also be provided to recipients in other countries

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outside Europe.

Where we share your personal information with third parties who are based outside Europe, we try to ensure a similar degree of protection is afforded to it by making sure one of the following mechanisms is implemented:

- **Transfers to territories with an adequacy decision.** We may transfer your personal information to countries or territories whose laws have been deemed to provide an adequate level of protection for personal information by the European Commission or UK Government (as and where applicable) (from time to time) or under specific adequacy frameworks approved by the European Commission or UK Government (as and where applicable) (from time to time), such as the EU-U.S. Data Privacy Framework or the UK Extension thereto.
- **Transfers to territories without an adequacy decision.**
 - We may transfer your personal information to countries or territories whose laws have **not** been deemed to provide such an adequate level of protection (e.g., the U.S.).
 - However, in these cases:
 - we may use specific appropriate safeguards, which are designed to give personal information effectively the same protection it has in Europe – for example, standard-form contracts approved by relevant authorities for this purpose; or
 - in limited circumstances, we may rely on an exception, or ‘derogation’, which permits us to transfer your personal information to such country despite the absence of an ‘adequacy decision’ or ‘appropriate safeguards’ – for example, reliance on your explicit consent to that transfer.

You may [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.

Cookie Notice

Notice last updated: March 7th 2025

1. Information on how we use cookies.

Our website and our emails (the “Site”) may use various cookies which allow us to distinguish you from other users of our Site, which helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site.

We use cookies to provide the content and functionality of our Site (strictly necessary cookies) and, with your permission, to personalize the content and advertisements that appear when you visit our Site and to analyze the traffic on the Site. In addition, we share information about your use of our Site with our third-party advertising partners and analytics providers, who may combine this information with other data that you provide to them or that they have collected when you use their services. You have the right to withdraw your consent at any time.

You do not need to allow cookies to visit most of the Site. However, enabling cookies may allow for a more tailored browsing experience and is required for certain parts of the Site to work.

For further information about this cookie notice, please contact us at dataprivacy@cin7.com.

Please refer to our Privacy Policy for more information on our privacy practices.

2. What are cookies and similar technologies?

When we refer to “cookies” in this cookie notice, we are referring to both cookies themselves (as described below) and the other similar technologies listed below.

- **Cookies**, these are small data files containing a unique identifier that are placed on your computer or mobile device when you visit a website.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.
- **Session-replay technologies**, such as those provided by Hotjar, Qualified, Pendo, and Storylane that employ software code to record users’ interactions with the Services in a manner that allows us to watch DVR-like replays of those user sessions. The replays include users’ clicks, mobile app touches, mouse movements, scrolls and/or keystrokes/key touches during those sessions.

Cookies and these similar technologies enable operators or websites to recognize your device and collect information from it when you interact with them and serve different purposes, like helping us understand how our Site is being used, letting you navigate between pages efficiently, remembering your preferences, improving your browsing experience, and showing you advertisements that are more relevant to you. Learn more about the policies of vendors we use at:

- Hotjar: <https://www.hotjar.com/legal/policies/privacy/>
- Pendo: <https://www.pendo.io/data-privacy-security/>
- Qualified: <https://www.qualified.com/legal/privacy>
- Storylane: <https://www.storylane.io/privacy-policy>

3. Key concepts

- **First-party cookies** are those set by a website that is being visited by the user at the time (e.g., cookies placed by us).
- **Third-party cookies** are cookies that are set by a domain other than that of the website being visited by the user. If a user visits a website and another entity sets a cookie through that website, this would be a third-party cookie.
- **Persistent cookies** are cookies that remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.
- **Session cookies** allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

4. Changing your cookie and advertising choices

Cookie Preference Center

You can change your cookie preferences when you visit our Site by going to the Cookie Preference Centre by clicking on the Cookie preference link at the bottom of this cookie notice.

Blocking web beacons, pixels/images/clear gifs

Most browsers, email clients, and devices allow you to configure your device to prevent images from loading which can block these technologies. To do this, follow the instructions in your particular browser, email client or device settings.

Session replay opt-out

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our Sites and Hotjar's use of tracking cookies on other websites at <https://www.hotjar.com/policies/do-not-track/>.

Browser Settings

Please note that internet browsers allow you to change your cookie settings. These settings are usually found in the 'options' or 'preferences' menu of your internet browser. In order to understand these settings, the following links may be helpful. Otherwise, you should use the 'Help' option in your internet browser for more details:

- [Cookie settings in Edge](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari](#)

However, please note that if you use your browser settings to block all cookies (including strictly necessary cookies), you may not be able to access all or parts of our Site.

Advertising choices.

You may be able to limit use of your information for interest-based advertising through the following settings/options/tools:

- **Privacy browsers/plug-ins.** Using privacy browsers and/or ad-blocking browser plug-ins that let

you block tracking technologies.

- **Platform settings.** Google and Facebook offer opt-out features that let you opt-out of use of your information for interest-based advertising. You may be able to exercise that option at the following websites:
 - Google: <https://adssettings.google.com/>
 - Facebook: <https://www.facebook.com/about/ads>
- **Ad industry tools.** Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
 - Network Advertising Initiative:
http://www.networkadvertising.org/managing/opt_out.asp
 - Digital Advertising Alliance: optout.aboutads.info.
 - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- **Mobile settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes. We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above. For this reason, we typically suggest you use our Cookie Preference Centre by clicking on the Cookie preference link at the bottom of this cookie notice.

5. Your consent

We will only place optional categories of cookie (i.e., those other than the 'Strictly necessary cookies' described below) on your device with your prior consent. You can give your consent to one or more of these optional categories of cookie by clicking on the relevant button on the banner displayed when you first visit our Site or at any time via our Cookie Preference Centre.

6. Can I withhold and withdraw my consent?

If you do not wish to give consent or wish to withdraw your consent to any optional categories of cookie, you can do so via the banner displayed when you first visit our Site or at any time via our Cookie Preference Centre (for more information see 'Changing your cookie and advertising choices').

Please note that disabling these cookies will affect the functionality of the Site and may prevent you from being able to access certain features on the Site. For example, we may not be able to recognize your device and you may need to log in every time you visit our Site.

7. What type of cookies do we use and why?

We use the following categories of cookies:

- **Strictly necessary cookies:** These cookies are necessary for the Site to function (such as by helping to ensure that the content of a page loads quickly and effectively) and cannot be switched off in our systems.
- **Analytics cookies.** These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Site. They help us to know which pages are the most and least

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popular and see how visitors move around the Site and gather information on error messages. If you do not allow these cookies we will not know when you have visited our Site, and will not be able to monitor its performance.

- **Functional cookies.** These cookies enable the Site to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, some or all of these services may not function in an optimized fashion.
- **Advertising cookies.** These cookies record your visit to our Site, any pages you have visited and the links you have followed. We will use this information to make our Site and the advertising displayed on it more relevant to your interests. This information will also be shared with third parties for this purpose (such as our advertising technology partners). These cookies may be set through our Site by our advertising technology partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other websites. If you do not allow these cookies, you will experience less targeted advertising.

8. Retention

A cookie will exist for different periods of time depending on the purpose of the cookie. For example, a session cookie which enables the Site to operate will only exist on your device whilst you browse our Site, but other cookies will remain on your device for longer such as some functionality cookies which need to stay on your device so that the Site can recognize you when you return. For more information about how long a cookie remains on your device, please see the cookie table below.

Name	Domain	Description	Duration	Type
_gcl_au	.cin7.com	Google Tag Manager sets this cookie to experiment advertisement efficiency of websites using their services.	3 months	Analytics
__cf_bm	.g2crowd.com	This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.	1 hour	Necessary
muc_ads	.t.co	Twitter sets this cookie to collect user behaviour and interaction data to optimize the website.	1 year 1 month 4 days	Advertisement
__cf_bm	.t.co	This cookie, set by Cloudflare, is used	1 hour	Necessary

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		to support Cloudflare Bot Management.		
personalization_id	.twitter.com	Twitter sets this cookie to integrate and share features for social media and also store information about how the user uses the website, for tracking and targeting.	1 year 1 month 4 days	Advertisement
__cf_bm	.hubspot.com	This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.	1 hour	Necessary
_cfuvid	.hubspot.com	Calendly sets this cookie to track users across sessions to optimize user experience by maintaining session consistency and providing personalized services	session	Necessary
bcookie	.linkedin.com	LinkedIn sets this cookie to track the use of embedded services.	1 year	Advertisement
li_gc	.linkedin.com	LinkedIn set this cookie for storing visitor's consent regarding using cookies for non-essential purposes.	6 months	Functional

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lidc	.linkedin.com	LinkedIn sets the lidc cookie to facilitate data center selection.	1 day	Functional
ga*	.cin7.com	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days	Analytics
_ga	.cin7.com	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	1 year 1 month 4 days	Analytics
_cq_duid	.cin7.com	Cheq sets this cookie to safeguard the website against malicious traffic. It keep an eye on the technical data and usage of the devices that connect to it.	3 months	Necessary
_cq_suid	.cin7.com	Cheq sets this cookie to safeguard the website against malicious traffic. It keep an eye on	session	Necessary

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		the technical data and usage of the devices that connect to it.		
cg_uuid	obs.buzzfighter.com	Cheq sets this cookie to create a unique ID for the visitor, enabling third parties to advertise to them with relevant content.	1 year	Advertisement
hjSessionUser*	.cin7.com	Hotjar sets this cookie to ensure data from subsequent visits to the same site is attributed to the same user ID, which persists in the Hotjar User ID, which is unique to that site.	1 year	Analytics
hjSession*	.cin7.com	Hotjar sets this cookie to ensure data from subsequent visits to the same site is attributed to the same user ID, which persists in the Hotjar User ID, which is unique to that site.	1 hour	Analytics
_uetSID	.cin7.com	Bing Ads sets this cookie to engage with a user that has previously visited the website.	1 day	Performance
_uetvid	.cin7.com	Bing Ads sets this cookie to engage with a user that	1 year 24 days	Performance

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		has previously visited the website.		
MUID	.bing.com	Microsoft Bing sets this cookie to identify unique web browsers visiting Microsoft sites. These cookies are used for advertising, site analytics, and other operational purposes.	1 year 24 days	Advertisement
CLID	www.clarity.ms	Microsoft Clarity set this cookie to store information about how visitors interact with the website. The cookie helps to provide an analysis report. The data collection includes the number of visitors, where they visit the website, and the pages visited.	1 year	Analytics
_fbp	.cin7.com	Facebook sets this cookie to store and track interactions.	3 months	Analytics
test_cookie	.doubleclick.net	The test_cookie is set by doubleclick.net and is used to determine if the user's browser supports cookies.	15 minutes	Advertisement

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__cf_bm	.hsforms.com	This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.	1 hour	Necessary
_cfuid	.hsforms.com	Calendly sets this cookie to track users across sessions to optimize user experience by maintaining session consistency and providing personalized services	session	Necessary
__cfuid	.hs-sites.com	Cloudflare sets this cookie to identify trusted web traffic.	session	Necessary
_clck	.cin7.com	Microsoft Clarity sets this cookie to retain the browser's Clarity User ID and settings exclusive to that website. This guarantees that actions taken during subsequent visits to the same website will be linked to the same user ID.	1 year	Analytics
IDE	.doubleclick.net	Google DoubleClick IDE cookies are used to store information about how the user uses the website to	1 year 24 days	Advertisement

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		present them with relevant ads and according to the user profile.		
_clsk	.cin7.com	Microsoft Clarity sets this cookie to store and consolidate a user's pageviews into a single session recording.	1 day	Analytics
__cf_bm	.get.cin7.com	This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.	1 hour	Necessary
__cfuid	.get.cin7.com	Cloudflare sets this cookie to identify trusted web traffic.	session	Necessary
SM	.c.clarity.ms	Microsoft Clarity cookie set this cookie for synchronizing the MUID across Microsoft domains.	session	Analytics
MUID	.clarity.ms	Microsoft Bing sets this cookie to identify unique web browsers visiting Microsoft sites. These cookies are used for advertising, site analytics, and other operational purposes.	1 year 24 days	Advertisement
MR	.c.bing.com	This cookie, set by Bing, is used to collect user information for	7 days	Analytics

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		analytics purposes.		
SRM_B	.c.bing.com	Used by Microsoft Advertising as a unique ID for visitors.	1 year 24 days	Performance
MR	.c.clarity.ms	This cookie, set by Bing, is used to collect user information for analytics purposes.	7 days	Analytics
ANONCHK	.c.clarity.ms	The ANONCHK cookie, set by Bing, is used to store a user's session ID and also verify the clicks from ads on the Bing search engine. The cookie helps in reporting and personalization as well.	10 minutes	Advertisement

9. Keeping our cookie notice up to date

We may need to update our cookie notice from time to time (including if we decide to use cookies differently), so please check this cookie notice on a regular basis for any changes.

Any changes will be updated here, or a replacement notice notified to you.