

Recorded Books, Inc. - Privacy Policy

Effective as of 7/13/2023

This Privacy Policy describes how Recorded Books, Inc. ("we", "us" or "our") processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including as applicable, our website, platform, mobile application, social media pages, marketing activities, live events and other activities described in this Privacy Policy (collectively, the "Service")).

California Notice at Collection: Please see the [California Notice at Collection](#) section below for important information about your rights under California law.

We may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information.

Notice to 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) accessing pages and content for our international audio brands: [BookaVivo](#), [RBmedia Verlag](#), and [Éditions Thélème](#).

Index

- [Personal information we collect](#)
- [How we use your personal information](#)
- [How we share your personal information](#)
- [Your choices](#)
- [Other sites and services](#)
- [Security](#)
- [International data transfers](#)
- [Children](#)
- [Changes to this Privacy Policy](#)
- [How to contact us](#)
- [Notice to European users](#)

Personal information we collect

Information you provide to us. Personal information you, as a visitor, buyer, or seller on our platform, may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, email address, and organization name.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, complete our surveys, communicate with us via chat features, social media, or otherwise.

- **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.
- **Marketing partners**, such as joint marketing partners and event co-sponsors.

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 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.

Cookies. Some of our automatic data collection is facilitated by cookies and similar technologies. 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 the devices from which you have previously logged in and 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;
- communicate with you about events or contests in which you participate;
- 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 attempt to reidentify any such data.

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

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.

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 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.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

Retention. We generally retain personal information 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 fraud prevention purposes, unless specifically authorized to be retained longer. To determine the appropriate retention period for personal information, we may consider factors such as 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 we have collected about you, we may either delete it, anonymize, aggregate or deidentify it, or isolate it from further processing.

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, online chat functionality providers, customer support, email delivery, marketing, consumer research and website analytics).

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 us, financing of us, 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 us 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 information about their additional rights below.

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

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-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.

Push notifications and device permissions. You may revoke any permissions you previously granted to us, such as permission to access your camera or camera roll, through the settings on your mobile device. You may opt out of push notifications by changing the settings on your mobile device.

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 content or close your account. You can choose to delete certain content through your account. If you wish to request to close your account, please [contact us](#).

Other sites and services

The Service may contain links to third-party 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 nor are they subject to this Privacy Policy. 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.

Children

The Service is not intended for use by anyone under 18. 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:** legal@recordedbooks.com
- **Mail:** 8400 Corporate Drive
Landover, MD 20785

- **Phone:** 800-305-3450

California Notice at Collection

This section applies only to California residents. It describes how we collect, use and share Personal Information of California residents in operating our business, and their rights with respect to that Personal Information. The Privacy Notice describes the personal information that we collect, the sources from which we collect it, the purposes for which we use it, the limited circumstances under which we disclose personal information, and with whom we disclose it. For purposes of this section, “Personal Information” and “Sensitive Personal Information” have the meanings given in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, “CCPA”) but and does not include information exempted from the scope of the CCPA.

Your privacy rights. As a California resident, you may have the rights listed below. However, these rights are not absolute. Therefore, we may decline your request in certain cases as permitted by law. We have no actual knowledge that we have sold or shared the personal information of California residents under 16 years of age in the past twelve months. We also do not use or disclose Sensitive Personal Information for purposes that California residents have a right to limit under the CCPA, nor do we engage in automated decision making or profiling, as defined under the CCPA.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - 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 and/or selling Personal Information.
 - The categories of third parties with which we share Personal Information.
 - The categories of Personal Information that we sold or disclosed for a business purpose.
 - The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you.
- **Correction.** You can ask us to correct inaccurate Personal Information that we have collected about you.

- **Deletion.** You can ask us to delete certain Personal Information that we have collected from you.
- **Opt-out of Sharing.** You can opt-out of certain processing of personal information for targeted advertising purposes; however, we do not sell or share your Personal Information.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

Exercising your right to information/know, access, appeal, correction, and deletion. You may submit requests to exercise your right to information/know, access, appeal, correction, or deletion by using the Data Requests inquiry type on the [Contact Us](#) webpage, calling us toll free at 800-305-3450, or via email to legal@recordedbooks.com.

Verification of Identity; Authorized agents. We may need to verify your identity in order to process your information/know, access, appeal, correction, or deletion requests and reserve the right to confirm your residency. To verify your identity, we may require government identification, a declaration under penalty of perjury, or other information, where permitted by law.

Under the CCPA, you may enable an authorized agent to make a request on your behalf upon. However, we may need to verify your authorized agent's identity and authority to act on your behalf. We may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your CCPA rights on your behalf, the information we request to verify your identity, and confirmation that you have given the authorized agent permission to submit the request.

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.

Personal information that we collect, use and disclose. We have summarized the Personal Information we collect and may disclose to third parties by reference below to both the categories defined in the "Personal information we collect" section of this Privacy Policy above and the categories of Personal Information specified in the CCPA (Cal. Civ. Code §1798.140(v)) and describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Personal Information (“PI”) we collect	CCPA statutory category	Categories of third parties to whom we “disclose” PI for a business purpose	Categories of third parties to whom we “share” PI
<ul style="list-style-type: none"> Contact data 	<ul style="list-style-type: none"> Identifiers (online) Identifiers (other) Commercial information California customer records 	<ul style="list-style-type: none"> Affiliates Service providers Third parties designated by you Professional advisors Authorities and others Business transferees Business and marketing partners 	<ul style="list-style-type: none"> N/A
<ul style="list-style-type: none"> Communications data 	<ul style="list-style-type: none"> Identifiers (online) Identifiers (other) Commercial information California consumer records Internet or Network Information 	<ul style="list-style-type: none"> Affiliates Service providers Professional advisors Authorities and others Business transferees Business and marketing partners 	<ul style="list-style-type: none"> N/A
<ul style="list-style-type: none"> Marketing data 	<ul style="list-style-type: none"> Identifiers (online) Identifiers (other) Commercial information California customer records Internet or Network Information 	<ul style="list-style-type: none"> Affiliates Professional advisors Authorities and others Business transferees 	<ul style="list-style-type: none"> N/A
<ul style="list-style-type: none"> Device data 	<ul style="list-style-type: none"> Identifiers (other) Internet or Network Information 	<ul style="list-style-type: none"> Affiliates Service providers Professional advisors Authorities and others Business transferees Business and marketing partners 	<ul style="list-style-type: none"> N/A
<ul style="list-style-type: none"> Online activity data 	<ul style="list-style-type: none"> Identifiers (other) Commercial 	<ul style="list-style-type: none"> Affiliates Service providers Professional advisors 	<ul style="list-style-type: none"> N/A

	<ul style="list-style-type: none"> information • Internet or Network Information 	<ul style="list-style-type: none"> • Authorities and others • Business transferees • Business and marketing partners 	
<ul style="list-style-type: none"> • Communication interaction data 	<ul style="list-style-type: none"> • Identifiers (online) • Identifiers (other) • Commercial information • California consumer records • Internet or Network Information 	<ul style="list-style-type: none"> • Affiliates • Service providers • Professional advisors • Authorities and others • Business transferees • Business and marketing partners 	<ul style="list-style-type: none"> • N/A
<ul style="list-style-type: none"> • Data derived from the above 	<ul style="list-style-type: none"> • Inferences 	<ul style="list-style-type: none"> • Affiliates • Service providers • Authorities and others • Business transferees • Business and marketing partners 	<ul style="list-style-type: none"> • N/A

Contact Us. If you have questions or concerns about our Privacy Policy or information practices, please contact us using the contact details set forth in the How to contact us section, above.

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 EEA or the UK (EEA and UK jurisdictions are together referred to as “**Europe**”).

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., information about individuals from which they are either directly identified or can be identified. It does not include “anonymous data” (i.e., information where the identity of individual has been permanently removed). The personal information that we collect from you is identified and described in greater detail in the section “[Personal information we collect.](#)”

Controller. Recorded Books, Inc. is the controller in respect of the processing of your personal information covered by this Privacy Policy for purposes of European data protection

legislation (i.e., the [EU GDPR](#) and the so-called ‘[UK GDPR](#)’ (as and where applicable, the “GDPR”). See the [How to contact us section](#) above for our contact details.

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 to deliver our Services to you (including our Site) (“**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 [How we use your personal information](#) above.

Purpose	Categories of personal information involved	Legal basis
Service delivery and operations	<ul style="list-style-type: none"> • Contact data • Communications data 	Contractual Necessity
Research and development / Service improvement and analytics	Any and all data types relevant in the circumstances	Legitimate interest. We have legitimate interest in understanding what may be of interest to our customers, improving customer relationships and experience, delivering relevant content to our customers, measuring and understanding the effectiveness of the content we serve to customers. Consent, in respect of any optional cookies used for this purpose.
Marketing and advertising / Events, promotions and contests	<ul style="list-style-type: none"> • Contact data • Communications data • Marketing data 	Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organisation 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.
Compliance and protection	Any and all data types relevant in the circumstances	Compliance with Law. Legitimate interest. 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	Any and all data types relevant in the circumstances	The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the Personal Information was collected. 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 compliance and protection purposes, unless specifically authorized to be retained longer.

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, 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 Services to you, and you fail to provide that personal information when requested, we may not be able to provide some or all of our Services to you. We will notify you if this is the case at the time.

No sensitive personal 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, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services, or otherwise to us. If you provide us with any sensitive personal information to us when you use the Services, 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 Services.

No Automated Decision-Making and Profiling. As part of the Services, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects. We will let you know if that changes by updating this Privacy Policy.

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.

Your rights

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

- Provide you with information about our processing of your personal information and give you access to your personal information.
- Update or correct inaccuracies in your personal information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.
- Delete your personal information where there is no lawful reason for us continuing to store or process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons that will be notified to you, if applicable, at the time of your request.

- **Portability.** Port a machine-readable copy of your personal information to you or a third party of your choice, in certain circumstances. Note that this right only applies to automated information for which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Restrict.** Restrict the processing of your personal information, if, (i) you want us to establish the personal information's accuracy; (ii) where our use of the personal information is unlawful but you do not want us to erase it; (iii) where you need us to hold the personal information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your personal information but we need to verify whether we have overriding legitimate grounds to use.
- Object to our processing of your personal information where we are relying on legitimate interests (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedom – 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. This will not affect the lawfulness of any processing carried out before you withdraw your consent. 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-marketing emails.

Exercising These Rights. You may submit these requests by email to legal@recordedbooks.com. 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. 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. 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 is below:

The Information Commissioner's Office
Water Lane, Wycliffe House
Wilmslow - Cheshire SK9 5AF
Tel. +44 303 123 1113
Website: <https://ico.org.uk/make-a-complaint/>

Data Processing outside Europe

Many of our service providers, advisers, partners, or other recipients of data are based in the US. This means that, if you use the Services, your personal information will necessarily be accessed and processed in the US. It may also be provided to recipients in other countries outside Europe.

It is important to note that that the US is not the subject of an 'adequacy decision' under the GDPR – basically, this means that the US legal regime is not considered by relevant European bodies to provide an adequate level of protection for personal information, which is equivalent to that provided by relevant European laws.

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 in accordance with applicable privacy laws 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).
- **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 US, see above).
 - 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.