

# PRIVACY POLICY

**LAST MODIFIED: March 18, 2025**

PPS International Limited, its subsidiaries and its affiliates (“PPS International,” “us,” “we” or “our”) operate and administer Solo IS. We understand that your privacy is important to you and we are committed to respecting your privacy and protecting your personal information. We have created this privacy policy (“Policy”) in order to comprehensively inform individuals about our privacy practices and to demonstrate our firm commitment to privacy.

This Policy describes how we collect, use, disclose, transfer, store, retain or otherwise process your personal information in the course of us:

- operating and administering the Solo IS platform at <https://www.soloisprofile.com/> (the “Platform”), which is a centralized platform to purchase products or arrange for services through the Platform; and
- collecting, processing and disclosing your personal information when you register in the Platform.

When we refer to “you” or “your,” we mean the person about whom we collect personal information as described herein. If the person accessing the Platform does so on behalf of, or for the purposes of, another person, including a business or other organization, “you” or “your” also means that other person, including a business organization, if applicable.

Please read this Policy carefully.

Our Policy includes:

1. [General Disclosures](#)
2. [What Information We Collect From You And For What Purposes](#)
3. [Your Information That We Receive From External Sources](#)
4. [When And With Whom Do We Disclose Your Information](#)
5. [Personal Information Relating to Children](#)
6. [How Long We Retain Your Information](#)
7. [Links To Other Sites](#)
8. [Security](#)
9. [U.S. Data Subject Rights](#)
10. [Changes To This Privacy Policy](#)
11. [Contact Us](#)

This Policy is supplemented by our:

[International Privacy Policy](#)

## 1. GENERAL DISCLOSURES

Our data centers are hosted in India. By providing your personal information to us, you acknowledge that it may be stored or processed in a country other than your country of residence, which may have privacy laws that differ from or are less comprehensive than those in your own country. If you do not wish for your personal information to be collected, processed, or stored in such locations, we advise you not to engage with us or use our Platform. Additionally, you can manage the collection of cookies by following the instructions outlined in the “How to Control Cookies” section of our [Cookie Policy](#). Depending on your country of residence, you may have additional rights and disclosures under applicable privacy laws regarding your personal information. Please note, we are not responsible for the privacy practices of third-party entities, including websites that may indicate a partnership or collaboration with us (e.g., co-branded pages or “in cooperation with” relationships). We also do not share information we collect with other websites, entities, or individuals unless expressly disclosed to you in this Policy. To safeguard your privacy, we recommend reviewing the privacy policies of any websites you visit.

This Policy sets forth our data policies and practices for the United States. If you are outside of the United States, please also review the provisions of our [International Privacy Policy](#). Depending on your country of residence, applicable privacy laws may provide you with a right to additional disclosures as well as special data subject rights with regards to your personal information.

## 2. WHAT INFORMATION WE COLLECT AND FOR WHAT PURPOSES

What information we collect and the purposes for which it is collected will depend on the context of our activities. Therefore, just because this Policy describes a particular data collection practice does not mean that we have necessarily collected that data from you. Instead, please review the applicable disclosures below to learn about how we may have collected data from you depending on how you have interacted with us. As a general rule, we will only collect this information directly from you, unless we state otherwise in the section titled [Your Information That We Receive From External Sources](#).

We may process your personal information into aggregated, anonymized or de-identified form for any purpose. Aggregated, anonymized or de-identified information is information that can no longer reasonably identify a specific individual and is no longer “personal information.”

### When you visit the Platform:

Information Collected	Purpose of Collection	Legal Basis For Processing
<b>Identifier Information:</b> <ul style="list-style-type: none"><li>• IP address</li><li>• Cookies (see our cookies policy)</li></ul>	We collect this information in order to: <ul style="list-style-type: none"><li>• administer and operate the Platform;</li><li>• protect the security and integrity of the Platform and our services; and</li><li>• prevent fraud and other prohibited or illegal activity.</li></ul> The purpose of our collection of	We process this information in order to pursue our legitimate interests in securing the Platform from bots, security threats and unauthorized use.  We will process some types of cookies with your informed consent.

	cookies is explained in our Cookies Policy.	
<b>Internet Or Other Electronic Network Activity Information:</b> <ul style="list-style-type: none"> <li>• Date, time and location of access to the Platform</li> <li>• Operating system</li> <li>• Browser type</li> <li>• Persistent electronic identifiers</li> </ul>	We collect this information in order to: <ul style="list-style-type: none"> <li>• measure, track and analyze trends and usage in connection with the use of the Platform; and</li> <li>• see how we can better optimize the Platform.</li> </ul>	We process this information with your informed consent.

Further, when you interact with the Platform, we may collect personal information from you in the form of cookies. For information regarding how we collect, process and disclose personal information in the context of cookies, view our [Cookie Policy](#).

#### When you register in the Platform:

Information Collected	Purpose of Collection	Legal Basis For Processing
<b>Identifier Information:</b> <ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Personal email address</li> <li>• Username and password</li> <li>• Country</li> <li>• Residential Address</li> <li>• Zip Code</li> </ul>	We collect this information in order to: <ul style="list-style-type: none"> <li>• create and maintain your profile in the Platform;</li> <li>• contact you with requested information; and</li> <li>• billing purposes.</li> </ul>	We process this information in order to maintain your profile in the Platform.  We also process this information with your informed consent.

### 3. YOUR INFORMATION THAT WE RECEIVE FROM EXTERNAL SOURCES

When possible, we collect personal information directly from you. However, in the course of operating the Platform and providing services to our customer, we may receive your personal information from our customers. For example, if you are an employee of our customer and they onboard us to provide the relevant services, we may receive some information about you from such customers.

### 4. WHEN AND WITH WHOM DO WE DISCLOSE YOUR INFORMATION

We do not sell your personal information.

In the course of our business, we may disclose your personal information to others. We will only disclose your information with the following service providers or other external entities under the circumstances described below and solely to the extent that it is necessary to accomplish the goal and purpose of the disclosure. Therefore, we may disclose your personal information:

- **To our customers.** We may disclose your personal information to our customers depending on the project that we are administering for them.
- **To our database hosting vendors.** Like many organizations, we utilize cloud databases to host our data, including your personal information, so that we can effectively and safely operate the Platform and provide services to our customers.
- **To our auditors.** We may be subject to audits from a number of entities as well as due to our own internal auditing policies. In order to accomplish an effective audit, we must provide information, which may include your personal information, to external auditors. We always ensure that your information is safely disclosed and stored and that auditors can only use your information for the purposes of completing an audit.
- **Our affiliates.** We may share your personal information with our affiliates for the purposes of administering the Platform and providing our services to our customers.
- **In corporate transactions.** We may share all or part of your personal information with other entities in connection with the sale, assignment, merger or other transfer of all or a portion of our organization or assets to such entities (including due to a sale in connection with a bankruptcy). We will require any such purchaser, assignee or other successor organization to honor the terms of this Policy.
- **For legal purposes.** We may disclose all or part of your personal information to courts, litigants, regulators, arbitrators, administrative bodies or law enforcement when we have reason to believe that disclosing this information is necessary to resolve actual or suspected claims. We may also disclose your personal information in order to identify, contact or bring legal action against someone who may be violating any agreement with us, or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of the Platform, or anyone else that could be harmed by such activities. We may disclose information in response to a subpoena, search warrant, in connection with judicial proceedings, or pursuant to court orders, legal process or other law enforcement measures. We may disclose or access personal information when we believe in good faith that the law requires it, to establish our legal rights or to defend against legal claims.

## 5. PERSONAL INFORMATION RELATING TO CHILDREN

The Children's Online Privacy and Protection Act (COPPA) regulates online collection of information from persons under the age of 13. It is our policy to refrain from knowingly collecting or maintaining personal information relating to any person under the age of 18. If you are under the age of 18, you may not sign-up for the Platform and please do not supply any personal information through the Platform. If you are under the age of 18 and have already provided personal information through the Platform, please have your parent or guardian contact us immediately using the information provided under Contact Us so

that we can remove such information from our files. Please delete all Platform related cookies and restrict further collection of cookies using the methods outlined in the section How to Restrict Cookies in our [Cookie Policy](#).

## **6. HOW LONG WE RETAIN YOUR INFORMATION**

We have an existing global personal data retention policy which governs the data life cycle of information within our systems. We retain personal information for as long as it is necessary to provide the services to you and for other legal compliance or essential business purposes such enforcing our contracts, maintaining the security of our services, business(es) and website, enforcing our legal rights, or dispute resolution.

## **7. SECURITY**

We take reasonable measures, including administrative, technical, and physical safeguards, to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. We hold information about you at our own premises and with the assistance of service providers. Further public disclosure here of our security measures could aid those who might attempt to circumvent those security measures. If you have additional questions regarding security, please contact us directly using the information provided under Contact Us.

## **8. U.S. DATA SUBJECT RIGHTS**

There are a number of U.S. states that provide specific consumer rights to residents of those jurisdictions regarding personal information. This section of this Policy describes the rights available to those individuals who are entitled to them. For more information, or to request to exercise your data rights, please use the information provided under Contact Us.

Not all individuals about whom we possess information will have access to these rights and we may not be able to provide these rights to everyone due to legal and jurisdictional limitations. We may not be able to comply with your request for a number of reasons, including:

- you do not live in a state that grants you the specific right that you have requested;
- the information that you have requested is not subject to the regulation that grants you the right to make a request in relation to your personal information;
- we are prevented by law, regulation or rule from complying with your request;
- we are not able to comply with your request without incurring disproportionate burden or expense;  
or
- if complying with your request conflicts with the integrity of our services or the ability to administer the Platform, to administer our business and related relationships or to establish, defend or administer legal claims.

If any of the above reasons apply, we will let you know in our response to your request. You have the right to initiate a complaint by sending us a message by following the instructions provided under Contact Us.

Note that we may be required to gather additional information from you in order to process your request. We will only use this information in the context of evaluating and responding to your request. If you fail or refuse to provide the necessary information, we may not be able to process your request.

This section contains the following U.S. state specific disclosures:

1. [California](#)
2. [Nevada](#)

#### A. CALIFORNIA

The California Consumer Privacy Act (“CCPA”) permits residents of California to have the following rights, which you may request to exercise from us.

Once we receive your request to exercise a data right, we will confirm receipt and begin to evaluate, and if appropriate, process the request. We may require that you provide additional information to confirm your identity, including providing us with at least two or more pieces of personal information to match against personal information about you that we may or may not maintain and which we have determined to be reliable for the purpose of verification.

We reserve the right reject your request if we are unable to verify your identity to a sufficiently high level of certainty. The information you provide to verify your identity will only be used for verification purposes, and a record of your request, including certain information contained within it, will be maintained by us for our files.

If we reject a request for any reason, we will inform you of the basis of the rejection.

**Right to Know: California residents have the right to request disclosure about what personal information we collect, use and disclose about them, including what categories of third-parties that we both disclose information to and collect information from.**

The general categories of personal information that we collect and disclose about California residents are listed in the general Policy under the appropriate sections:

- [What Information We Collect From You And For What Purposes](#)
- [Your Information That We Receive From External Sources](#)
- [When And With Whom Do We Disclose Your Information](#)

If you are a California resident and would like to request the specific pieces personal information that we collect, use and disclose about you, please contact us using the information provided under Contact Us.

**Right to Delete:** California residents have the right to request the deletion of their personal information maintained by us.

California residents have the right to request that we delete the personal information we maintain about them. We will make every effort to comply with California residents' requests to delete their personal information, however, certain laws or other legal requirements might prevent some personal information from being deleted. If you are a California resident and would like to request the deletion of your personal information, please contact us using the information provided under Contact Us. To verify any request to delete personal information, you will be required to provide the information requested. Failure to do so could result in our inability to comply with your request.

**Right to Non-Discrimination:** California residents have the right to not be discriminated against due to the exercise of their privacy rights under the CCPA.

Under the CCPA, California residents have the right not to receive discriminatory treatment by us for the exercise of their privacy rights. However, the exercise of certain privacy rights by California residents will make it so that we are no longer able to provide those residents with certain services and communications. For example, if, at the request of a California resident, we delete all of the California resident's personal information that we maintain, we can no longer share your survey reports.

**Right to Opt-Out of the Sale of their Personal Information:** California residents have the right to opt-out of the sale of their personal information.

Under the CCPA, California residents can request that a company stop selling their personal information. This is referred to as the right to "opt-out."

We do not sell the personal information of California residents, including of those under the age of sixteen, as described by the CCPA. In all cases, we do not disclose your personal information without either (i) notifying you in advance through the disclosures in this Policy or (ii) in the case of disclosures to our customers, obtaining your consent, in which case we are disclosing your personal information at your specific direction.

**Right to Make Requests Through an Authorized Agent:** California residents can designate an authorized agent to make a request under the CCPA on their behalf.

California residents can designate an authorized agent to make requests under the CCPA related to the residents' personal information. Only you, or a person you have designated in writing as your authorized agent, may make a consumer request related to your personal information.

If you wish to have an authorized agent make a verifiable consumer request on your behalf, they will need to provide us with sufficient written proof that you have designated them as your authorized agent, such as a power of attorney pursuant to California Probate Code sections 4000 to 4465. We will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

We can deny any request made by a purported authorized agent who does not submit proof that he or she has been authorized by the California resident to act on the California resident's behalf. For more information on submitting a request on behalf of a California resident as an authorized agent, you can contact us using the information provided under Contact Us.

## **B. NEVADA**

Nevada law provides Nevada residents the ability to opt-out of the sale of their personal information. However, we do not sell the personal information of Nevada residents as described by Nevada law. We do not disclose your personal information unless the disclosure is (i) to an entity that processes personal information on our behalf as a service provider or (ii) for purposes which are consistent with the reasonable expectations of a consumer considering the context in which we collected it, such as, for example, to our customers in the context of providing them with the relevant reports.

## **11. CHANGES TO THIS PRIVACY POLICY**

From time to time it may become necessary to update or change this Policy consistent with changes in data protection laws and our privacy program. We have the discretion to update this Policy at any time. When we do, we will revise the effective date at the top of this page and most current version of this Policy will be applicable.

If we make any changes to this Policy that materially change how we treat your personal information, we will endeavor to provide you with reasonable notice of such changes, such as via prominent notice in the Platform or to your email address of record, and where required by law, we will obtain your consent or give you the opportunity to opt out of such changes. By continuing to engage with the Platform without consenting to the changes or opting out, it will be deemed that you have consented to such changes by your conduct.

We encourage you to periodically check here for the most current version of the Policy to stay informed. You acknowledge and agree that it is your responsibility to review this Privacy Statement periodically and become aware of modifications.

## **12. CONTACT US**

To submit questions or to inquire about or submit a request relating to data subject rights, you can contact us by:

- **Calling** us at 1-864-962-6789
- **E-mailing** us directly at [assessments@pps-synetamericas.net](mailto:assessments@pps-synetamericas.net)

You can contact our relevant team in writing through the below:

Attention:

Janet Langley, Vice President - Operations

PO Box 80879, Simpsonville, SC 29680

E-mail: [janet.langley@pps-synetamericas.net](mailto:janet.langley@pps-synetamericas.net)

# INTERNATIONAL PRIVACY POLICY

**LAST MODIFIED: March 18, 2025**

The above general Policy still applies to those individuals who reside outside of the United States or who have had personal information collected by us in a country other than the United States. However, due to various international regulations, those individuals may be entitled to additional disclosures and rights. This International Privacy Policy (the “International Policy”) supplements the above general Policy, but where the provisions of the general Policy and this International Policy cannot be construed consistently, this International Policy will govern.

Please note that by engaging with the Platform or by having personal information collected by us, your personal information is being stored or processed in India where our data center and servers are located and operated. India may not have privacy laws that are as strong or comprehensive as the privacy laws in your own country. Your personal information may also be stored in a multi-tenant cloud environment hosted by our service providers.

Depending on your country of residence, you may have data rights as provided by various laws, regulations and codes, which can include the Canadian Personal Information Protection and Electronic Documents Act, the European Union General Data Protection Regulation, the UK General Data Protection Regulation, the Swiss Revised Federal Act on Data Protection 1992 and Ordinance on the Federal Act on Data Protection, the New Zealand Privacy Act 2020, the Japanese Amended Act on Protection of Personal Information or the Australian Privacy Act 1988, among others. An interactive map showing the various privacy and protection laws around the world can be found [here](#).

**THIS INTERNATIONAL POLICY APPLIES TO ALL PERSONAL INFORMATION ABOUT YOU THAT WE COLLECT, HOLD, USE AND DISCLOSE, REGARDLESS OF THE WAY IN WHICH WE COLLECT IT (I.E. WHETHER THROUGH THE PLATFORM, THE SERVICES OR OTHERWISE).**

Our International Policy includes:

1. [Collection Of Personal Information](#)
2. [How We Use Personal Information](#)
3. [The Basis On Which We Process Your Personal Information](#)
4. [Obtaining Consent](#)
5. [Third-Parties](#)
6. [Limitations](#)
7. [Retention Of Personal information](#)
8. [Access And Rights To Your Personal Information](#)
9. [Response Time](#)
10. [Costs](#)
11. [Identifying You In Connection With Requests](#)
12. [Opt-Out And Unsubscribe](#)

13. [Accuracy](#)
14. [Safeguards](#)
15. [Contact](#)

## **1. COLLECTION OF PERSONAL INFORMATION**

You can find specific details about the personal information that we collect about you in the sections titled [What Information We Collect From You And For What Purposes](#) and [Your Information That We Receive From External Sources](#) of the general Policy.

Where we are the data controller with regard to the personal information that we process, you may exercise your rights as a data subject, including the right to object to the processing of your personal information when it is processed based on legitimate interests, as described in this International Policy. Where we are collecting your personal information on behalf of another entity (i.e., we are not the data controller), we will provide you with the identity of the data controller so that you may exercise your rights as a data subject directly with them.

## **2. HOW WE USE PERSONAL INFORMATION**

As a general matter, we collect your personal information to operate and administer the Platform, maintain your profile and provide services to our customers. You can find specific details about the purposes for which we collect personal information about you in the sections titled [What Information We Collect From You And For What Purposes](#) and [Your Information That We Receive From External Sources](#) of the general Policy.

## **3. THE BASIS ON WHICH WE PROCESS YOUR PERSONAL INFORMATION**

We will only collect and process your personal information as is reasonably necessary for, or directly related to, one or more of our functions or activities, including to operate and administer the Platform, maintain your profile and provide services to our customers.

Where required by law, we rely on the following legal grounds to process your personal information, namely:

- Performance of a contract: We may need to collect and use your personal information to enter into a contract with you or to perform a contract or provide services that you have requested from us.
- Consent: Where required by law, we will obtain your explicit consent for collecting and processing of your personal information.

- Legitimate interests: We may use your personal information for our legitimate interests of detecting and preventing fraud as well as maintaining the security of our network and information systems.
- Legal matters: We may process your personal information when its collection, use or disclosure is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim.

You can find specific details about the legal grounds for our processing of your personal information in the sections titled [What Information We Collect From You And For What Purposes](#) and [Your Information That We Receive From External Sources](#) of the general Policy.

## **4. OBTAINING CONSENT**

Except when otherwise permitted by law or binding regulation, we will obtain the requisite consent from you prior to collecting and, in any case, prior to using or disclosing your personal information for any purpose other than as disclosed in this International Policy. You may provide your consent to us orally, in writing, by electronic communication, through your actions or any other means reasonably capable of conveying your consent.

## **5. DISCLOSURE OF YOUR PERSONAL INFORMATION**

We remain responsible for all personal information communicated to other entities for processing on our behalf. As such, we ensure that other entities that are engaged to provide products or services on our behalf and are provided with personal information are required to observe the intent of this International Policy by having comparable levels of security protection or, when required, by assuring us (through a confidentiality agreement) that they will not use or disclose the personal information for any purpose other than the purpose for which the personal information was communicated. You can find specific details about to whom we disclose your personal information in the section titled [When And With Whom Do We Disclose Your Information](#) of the general Policy.

## **6. LIMITATIONS**

We only collect the personal information necessary to fulfill the purposes identified to you prior to or at the time of collection, or any other reasonable and legitimate purposes or as required by law. We do not use or disclose your personal information, except for the purposes for which it was collected, or new purposes to which you have consented, or as required or otherwise permitted by applicable law. If we seek to use your personal information for an additional purpose beyond what was disclosed to you at the point of original collection, we will provide you with additional disclosures as required by law.

We do not require consent to the collection, use or disclosure of personal information beyond what is reasonably required for the purpose of the collection, or to comply with our obligations under applicable law or regulation.

## **7. RETENTION OF PERSONAL INFORMATION**

We may retain your personal information for a period of time that is consistent for us to maintain your profile and perform our services to customers, as well as to comply with applicable law, applicable statute of limitations and our data retention practices.

We may also retain your personal information as we believe is reasonably necessary to comply with applicable law, regulation, legal process or governmental request, to detect or prevent fraud, to collect fees owed, to resolve disputes, to address problems, to assist with investigations, to enforce other applicable agreements or policies or to take any other actions consistent with applicable law.

## **8. ACCESS AND RIGHTS TO YOUR PERSONAL INFORMATION**

There are a number of data privacy laws that provide specific data subject rights to residents of certain jurisdictions. This section of this International Policy describes the rights available to those individuals who are entitled to them. Not all individuals about whom we possess information will have access to these rights and we may not be able to provide these rights to everyone due to legal and jurisdictional limitations. We may not be able to comply with your request for a number of reasons, including:

- you do not live in a jurisdiction that grants you the specific right that you have requested;
- the information that you have requested is not subject to the regulation that grants you the right to make a request in relation to your personal information;
- we are prevented by law, regulation or rule from complying with your request;
- we are not able to comply with your request without incurring disproportionate burden or expense; or
- if complying with your request conflicts with the integrity of our services or the ability to administer the Platform, to administer our business and related relationships or to establish, defend or administer legal claims.

If any of the above reasons apply, we will let you know in our response to your request. Note that we may be required to gather additional information from you in order to process your request. We will only use this information in the context of evaluating and responding to your request. If you fail or refuse to provide the necessary information, we may not be able to process your request.

Subject to the exceptions provided by applicable law or regulation, and depending on your country of residence, you may have the following rights regarding your personal information:

- the right to know what personal information we maintain or process about you;
- the right to access personal information maintained about you;
- the right to ensure that your personal information is accurate and complete;
- the right to correct incomplete, inaccurate or out-of-date personal information;

- the right to erasure, deletion or the right to be forgotten;
- the right to restriction or suppression of processing of personal information;
- the right to data portability with regards to your personal information;
- the right to withdraw consent to the processing of your personal information if consent was previously provided;
- the right to opt-out of transfers of your personal information to a third party; and
- the right to opt-out of any direct marketing communications received from us, to the extent that you receive any.

You can request to exercise these rights by sending us an email to [assessments@pps-synetamericas.net](mailto:assessments@pps-synetamericas.net). Please be as specific as possible in your request so that we can meet the applicable handling timelines.

Finally, you have the right to raise a complaint with us or the appropriate data protection authority of your country of residence if you feel that our processing of your personal information violates your individual rights, is not in line with this International Policy or violates the privacy principals, laws or regulations of your country of residence. For example:

- You can contact our relevant team by using the information provided under [Contact Us](#) of the general Policy. We will promptly investigate any complaint and will respond within the timeframes describe in this International Privacy Policy.
- If you are a resident of the European Union, you can find your appropriate data protection authority by following this [link](#).
- If you are a resident of Switzerland, you can contact your data protection authority through the information provided in this [link](#).
- If you are a resident of the United Kingdom, you can contact your data protection authority through the information provided in this [link](#).
- If you are a resident of Australia, you can contact your data protection authority through the information provided in this [link](#). You can view the Australian Privacy Principles through this [link](#).
- If you are a resident of Canada, you can contact your data protection authority through the information provided in this [link](#).
- An interactive map showing the various Data Protection Authorities around the world and how to contact them can be found [here](#).

## 9. RESPONSE TIME

We will make every reasonable effort to respond to your written request not later than 30 days after receipt of such request. We will advise you in writing if we cannot meet your request within this time limit. When applicable, you have the right to make a complaint to the appropriate supervisory authority, as detailed in this International Policy, with respect to this time limit.

## **10. IDENTIFYING YOU IN CONNECTION WITH REQUESTS**

We may require that you provide to us additional information to identify yourself before we provide information about the existence, use or disclosure of your personal information in our possession. Any such information that you provide to us shall be used only for this purpose.

## **11. OPT-OUT AND UNSUBSCRIBE**

You may opt-out of receiving marketing and promotional messages from us, if those messages are powered by us, by following the instructions in those messages. If you decide to opt-out, you will still receive non-promotional communications that are necessary to maintain your profile or to maintain the existing business relationship between you and us, to the extent there is one.

We only engage in remarketing with your consent through the acceptance of a cookie banner when you access appropriate webpages. You can opt-out of this marketing by deleting all Platform related cookies and restrict further collection of cookies using the methods outlined in the section How to Restrict Cookies in our [Cookie Policy](#).

## **12. ACCURACY**

We will use reasonable efforts to ensure that your personal information is kept as accurate, complete and up to date as possible. We do not routinely update your personal information in our possession, unless such a process is necessary. In order to help us maintain and ensure that your personal information is accurate and up to date, you must inform us, without delay, of any change in the data that you have provided to us.

You can at any time, challenge the accuracy or completeness of the personal information we have about you, subject to the exceptions provided by applicable law. If you demonstrate that the personal information we have on you is inaccurate or incomplete, we will amend the personal information as required. Where appropriate, we will transmit the amended data to third parties to whom we have communicated your personal information.

## **13. SAFEGUARDS**

We use security safeguards appropriate to the sensitivity of personal information to protect it from loss or theft, as well as unauthorized access, disclosure, copying, use or modification. These safeguards include physical measures, such as restricted access to offices and equipment, organizational measures, such as security clearances and publishing this policy to appropriate personnel with instructions to act in accordance with its principles (for example, limiting access on a “need to know” basis), and technological measures, such as the use of passwords and/or encryption.

To administer our business and provide our services, we may share your personal information with our affiliates or with third parties in locations around the world. When we transfer your personal information outside your jurisdiction, we will take steps to ensure that such data transfers comply with applicable data privacy laws. If you live in the European Economic Area (EEA), your personal information may be stored and processed outside the EEA and in countries that are not subject to an adequacy decision by the European Commission. If we transfer or store personal information outside of the EEA, or other countries or economies that require legal protection for international data transfer, we will ensure that an adequate level of protection is provided, as further described below, entering into written data processing agreements with recipients that require them to provide the same level of protection, or relying on other legally-approved transfer mechanisms.

We have further committed to cooperate with the panel established by the EU data protection authorities and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to any complaints concerning data transferred from the EU and Switzerland.

If you are a resident of the UK, Switzerland or European Economic Area (EEA), and your personal information is transferred outside of the UK or the EEA, we will:

- Process it in a territory which the European Commission has determined provides an adequate level of protection for personal information;
- Implement appropriate safeguards to protect your personal information, including transferring it in accordance with applicable transfer mechanisms, including the European Commission's Standard Contractual Clauses; or
- Entering into intra-group data processing agreements with non-EU recipients that require them to provide the same level of protection, or relying on other legally-approved transfer mechanisms.

## 14. CONTACT

Please direct all complaints or other inquiries regarding personal information, requests relating to data subject rights, the general Policy, or the International Privacy Policy to the contact provided below:

- **Calling** us 1-864-962-6789
- **E-mailing** us directly at [assessments@pps-synetamericas.net](mailto:assessments@pps-synetamericas.net)

You can contact our relevant team in writing through the below:

Attention:

Janet Langley, Vice President-Operations  
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