

# INSIGHT GLOBAL PRIVACY POLICY

**Effective Date:** January 1, 2020

**Last Updated:** January 1, 2023

The Privacy Policy describes how Insight Global, LLC and its affiliated entities (“Insight Global” “we” and “us”) process personal information about you. This Privacy Policy applies when you visit or use our websites or mobile applications (each a “Site” and collectively “Sites”), contact our customer service team, engage with us on social media, communicate with us on behalf of a vendor or client, purchase our products or services, or otherwise interact with us.

This Policy does not apply to personal information processed in connection with applications to work for Insight Global as part of our in-house team or to personal information collected in the course of your employment as part of our in-house team. Our In-House Team Privacy Notice applies to that personal information.

The Policy also does not apply to personal information that we process in connection with a candidate’s application to or appointment as an consultant to fulfil roles for Insight Global’s clients or companies that we represent. Our Candidate Privacy Notice applies to that personal information.

**By using the website, you are consenting to this Privacy Policy. Please read it carefully.** If you have any questions, please contact us as provided below. You may download a copy of this Privacy Policy by clicking [here](#).

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## Categories of Personal Information We Collect

We collect the following categories and types of personal information with your consent or as otherwise required or permitted by law:

- **Contact Information.** We collect full name, email address, current and prior address, telephone number, and business contact information.
- **Identifiers.** We collect Internet protocol address, signature, username and password, and social media user names.
- **Personal Characteristics or Traits.** We collect date of birth, gender, age, nationality, racial or ethnic origin, religion, marital status, citizenship status, military or veteran status and disability information.
- **Financial Information.** We collect tax identification number, financial or bank account information, tax-related information, wire instructions, payment card number, payment card expiration date and CVV code, card or account security details, and billing address.
- **Commercial Information.** We collect records of products or services purchased, obtained, or considered.
- **Internet or Electronic Usage Data.** We collect data related to network and website interaction history, IP address, website cookie information, interaction with advertisements and browsing time.
- **Audio/Visual Data.** We collect audio, electronic, photographic, visual or similar data including videos, photographs, or audio recordings.
- **Geolocation Data.** We collect geolocation data including the general region or area from which you access our Sites.
- **Professional or Employment Information.** We collect your job title, office location, business contact details, and company entity when you contact us on behalf of a third-party.
- **Inferences:** We use information from the categories of personal information described above in order to create a profile about you, to reflect your preferences, characters, behavior and attitude.

## Sources Of Personal Information

We collect information in a variety of ways:

- **Directly from you.** We collect contact information, identifiers, financial information, commercial information, and professional or employment information that you provide directly to us.
- **When you visit our locations.** When you visit our offices or facilities, we also collect contact information and audio/visual data.
- **Automatically.** When you access our Sites, we collect identifiers, geolocation data, and internet or electronic usage data using tools like browser cookies.
- **From third parties:** We may collect contact information, identifiers, financial information, commercial information, and professional or employment information from third-parties including our vendors, clients, and service providers.

- **Social media platforms.** Depending on the information you choose to share and your privacy settings, we may collect contact information, identifiers, audio/visual data, personal characteristics or traits, geolocation data, commercial information, professional or employment information, internet or electronic usage data, and inferences. Based on the way you have set your privacy settings on your social media accounts, most social media platforms, like Facebook and Instagram, analyze data about how you interact with our Sites and combine it with information on other users to provide us information about you. In addition, we may receive information about you if other users interact with us on social media and information about you is visible to us, for example the fact that you are “friends” or other public-facing profile information.

## Purposes for Collecting Personal Information

We use your personal information for the following purposes:

- **Transactional Purposes.** We use contact information, identifiers, financial information, professional or employment information, and commercial information to: (i) provide you or our clients with products and services that we offer; (ii) communicate with you; (iii) provide you with customer assistance; and (iv) provide supporting business activities such as billing and collections, procurement, and tax related activities.
- **Analytical Purposes.** We use identifiers, internet or electronic usage data, geolocation data, commercial information, and inferences to analyze preferences, trends and statistics.
- **Marketing and Promotional Purposes.** We use contact information, identifiers, financial information, professional or employment information, internet or electronic usage data, geolocation data, and inferences to improve our marketing efforts, conduct market research, prospect for new clients or consultants, client relationship management, client engagement, administering promotions, and to provide you with information about us, including personalized marketing communications.
- **Maintenance and Improvement of our Sites and Systems.** We use identifiers, geolocation data, internet or electronic usage data to improve our Sites and systems, provide and maintain functionality on our Sites and systems, and help us diagnose technical and service problems and administer our Sites and systems.
- **Develop and Improve Our Products and Services.** We use contact information, identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, and professional or employment information to help us develop new products and services and to improve and analyze our existing products and service offerings.
- **Security and Fraud Prevention.** We use contact information, identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, and professional or employment information to: (i) protect our Sites, premises, assets, systems, products, services and intellectual property; (ii) protect us, our affiliated companies, our employees, our carriers and others from fraud, theft and other misconduct; (iii) conduct vendor due diligence; and (iv) detect and prevent fraud, theft and misconduct including by verifying the identity of those we are conducting business with.

- **Legal:** We use contact information, identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, and professional or employment information to comply with our legal obligations, including reporting requirements, and defend ourselves in legal proceedings, and protect our company and our property, employees, and others through legal proceedings.
- **Other Purposes:** We may use contact information, identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, and professional or employment information for other reasons we may describe to you.

## How We Share Personal Information

We share personal information in the following circumstances or as otherwise described in this Privacy Policy:

- **Service Providers.** We may share personal information with vendors and service providers who support the operation of our services, website, and our business and who need access to such information to carry out their work for us (including, for example, cloud hosting, payment processing, order fulfillment, email delivery, marketing, insurance, operating systems and platforms, transportation, and customer support services). In some cases, such as payment processors, the vendor or service provider may directly collect the information from you on our behalf.
- **Affiliates.** We may share personal information with and among our parent company, subsidiaries, affiliates, or their successors or assigns.
- **Marketing/Analytics/Advertising Partners.** We may share personal information with third party marketing, analytics or advertising partners, including social media platforms and networks, for commercial purposes such as sending you marketing emails.
- **Professional Advisors.** We may share information with professional advisors, such as lawyers, bankers, tax consultants, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- **Government Entities.** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us.
- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments.
- **With Your Consent or At Your Direction.** We may share information with third parties whenever you consent to or direct such sharing.

- **Other Reasons.** We may share information for other reasons we may describe to you.

## We Combine Information

We combine information we obtain from different sources with publicly available information, including to create inferences about you. For example, we may combine information that we have collected offline with information we collect online. We combine information that we have collected across other third party sites. We combine information across devices, such as computers and mobile devices. We may also combine information we get from a third party with information we already have.

## Sensitive Personal Information

Unless specifically requested, we ask that you not send us, and you not disclose to us, through the Services or otherwise, any Sensitive Personal Information (e.g., social security number, taxpayer identification number, passport number, driver's license number, or other government-issued identification number; credit or debit card details or financial account number, with or without any code or password that would permit access to the account, credit history; or information on race, religion, ethnicity, sex life or practices or sexual orientation, medical or health information, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records, or information on other judicial or administrative proceedings).

## How Long We Keep Personal Information

We will retain and use your information for as long as we need it to provide you services or products, or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If you wish to request that we no longer use your information to provide you services or products, please contact us at [privacy@insightglobal.com](mailto:privacy@insightglobal.com).

Where we process personal information for marketing purposes, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing so that we can respect your request in future.

We use the following criteria to determine retention periods:

- how long the information is needed to provide our services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the information for period of time;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data, and
- what the expectation for retention was at the time the data was provided to us.

## Cookies, Analytics, and Other Tracking Technology

### Cookies and Tracking Technology

We want you to be aware that certain online tools exist to help us serve and recognize you when you visit our website. We receive and store certain types of information when you visit our website. When you access the website, we (including companies we work with) may place small data files on your computer or other device. These data files may be web beacons, cookies, clear gifs, pixel tags, e-tags, flash cookies, log files, or other local storage provided by your browser or associated applications. These tracking technologies, which are often referred to collectively as cookies, allow us to understand how users navigate to and around our website, view different pages, access content and request Services. We may use them, for example, to keep track of your preferences and profile information and collect general usage and volume statistical information. If you want to remove or block cookies, you may be able to update your browser settings. You can also find instructions on how to manage cookies on different types of web browsers at [www.allaboutcookies.org](http://www.allaboutcookies.org). Please click [here](#) to change your preferences regarding cookies.

### Do Not Track Signals

Some browsers have a “do not track” feature. It lets you tell websites you visit that you do not want them to track your online activity. These features are not yet uniform across browsers. Our Sites are thus not currently set up to respond to these signals. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

### Global Privacy Control

Our website does not respond to Global Privacy Control.

### Third-party Analytics and Advertising

We allow others to provide analytics services and serve advertisements on our behalf across the Internet and in mobile applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Sites and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked and conversion information. We use this information to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand your online activity. Please click [here](#) to change your preferences regarding analytics and advertisement cookies.

### Google Analytics

We use analytics services provided by Google Analytics. If you would like more information on how Google uses data when you visit or use our Sites, please visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners). If you would like to opt-out, Google provides an opt-out tool which is available at <https://tools.google.com/dlpage/gaoptout>.

## Links to Other Websites

Our Sites may include links to other websites or applications whose privacy practices may differ from ours. If you submit personal information to any of those websites or applications, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit or application that you use.

## Shopify, Shop and Shop Pay

We use Shopify to power our online store – Shop IG. When you create an account, provide your personal information to Shopify, or use Shopify’s apps and services, Shopify will process your personal information. Shopify’s processing of your personal information will be governed by Shopify’s privacy policy, which is available at <https://www.shopify.com/legal/privacy/app-users>. When you use Shop or another Shopify app to make a purchase, Shopify will share your personal information with us. We will process the personal information we receive from Shopify in accordance with this Privacy Policy.

## Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security and encourage you to use websites and share information with caution.

## This Website is Not Intended for Children

We do not knowingly collect or store any personal information from anyone under the age of 13. If we become aware that we have collected or stored personal information from an individual under age 13, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to [privacy@insightglobal.com](mailto:privacy@insightglobal.com).

## Marketing Communications

You can opt out of marketing or advertising emails and newsletters by using the "unsubscribe" link or mechanism noted in communications you receive from us. You may also request to opt out of marketing or advertising emails by contacting us through one of the methods specified in the Contact Us section of this Privacy Policy. Once we process your request, we will cease using the information for such purposes at no charge to you. If you opt out of getting marketing messages, you will continue to receive messages from us about your relationship with us where permitted by law.

## Processing in the United States and Canada

Please be aware that information we obtain about you will be processed in the United States and across Canada by or service providers or us. By using the Sites or our services, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States, Canada or other jurisdictions may be different from the laws

in your country of residence. The United States may not afford the same level of protection as laws in your own country.

## California Privacy Rights/Notice to California Residents

**Shine The Light.** If you are a California resident, this section applies to you. The California Shine the Light law (Cal. Civ. Code § 1798.83) permits residents of California to request certain details about how their information is shared with third parties for the third-parties’ direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at [privacy@insightglobal.com](mailto:privacy@insightglobal.com) and include “CA Shine the Light” in the subject line of your email.

### California Consumer Privacy Act.

Categories, Sources, and Uses of Personal Information We Collect. In the preceding 12 months, we have collected the following categories of personal information: contact information, identifiers, financial information, commercial information, internet or electronic usage data, geolocation data, professional or employment information, audio/visual data, personal characteristics or traits, and inferences. For details about precise data points we collect, the categories of sources of such collection, and the business and commercial purposes for collecting personal information, please see the sections above titled Categories of Personal Information We Collect, Sources of Personal Information, and Purposes for Collecting Personal Information.

Use or Disclosure of Sensitive Personal Information. In the preceding 12 months, we have not used or disclosed sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

Sale or Sharing of Personal Information. In the preceding 12 months, we have “sold” or “shared” (as those terms are defined in the CCPA) identifiers, commercial information, internet or electronic usage data, geolocation data, and inferences to marketing/analytics/advertising partners. We do not knowingly sell or share the personal information of minors under the age of 16.

Disclosure for a Business Purpose. In the preceding 12 months, we have disclosed the following categories of personal information to the following categories of third party recipients:

<i>Category of Personal Information</i>	<i>Categories of Recipients</i>
Contact Information	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Professional Advisors</li> <li>• Operating Systems and Platforms</li> <li>• Government Entities</li> </ul>
Identifiers	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Professional Advisors</li> </ul>



	<ul style="list-style-type: none"> <li>• Operating Systems and Platforms</li> <li>• Government Entities</li> </ul>
Financial information	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Operating Systems and Platforms</li> <li>• Government Entities</li> </ul>
Commercial Information	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Professional Advisors</li> <li>• Operating Systems and Platforms</li> <li>• Government Entities</li> </ul>
Personal Characteristics or Traits	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Professional Advisors</li> <li>• Operating Systems and Platforms</li> <li>• Government Entities</li> </ul>
Geolocation Data	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Operating Systems and Platforms</li> </ul>
Internet or Electronic Usage Data	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Operating Systems and Platforms</li> </ul>
Professional or Employment Information	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Professional Advisors</li> <li>• Operating Systems and Platforms</li> <li>• Government Entities</li> </ul>
Audio/Visual Data	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Professional Advisors</li> <li>• Operating Systems and Platforms</li> </ul>
Inferences	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Operating Systems and Platforms</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Government Entities</li> </ul>

For a more expansive description of the categories of recipients and business purposes for which we share personal information, please see the How We Share Personal Information section above.

Your Rights Under the CCPA. Subject to certain exceptions and limitations, the CCPA affords California consumers the following rights:

- You have the right to request that we tell you (i) the categories of personal information we have collected, sold, or shared about you, (ii) the sources of that information, (iii) the business or commercial purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed, sold or shared personal information.
- You have the right to request that we provide you with a copy of your personal information .
- You have the right to request that we delete personal information that we have collected from you. We may not delete all of your personal information if one of the exceptions to the CCPA applies.
- You have the right to opt-out of the sale or sharing of your personal information.
- You have the right to direct us to limit the use or disclosure of your sensitive personal information to only the purposes specified in the CCPA.
- You have the right to correct inaccurate personal information that we hold about you.
- You have the right to opt out of automated decision-making, including profiling.
- You have the right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you, deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA rights.

Exercising Your Rights. To exercise any of your CCPA rights, please use our webform or call us toll free at 1-833-742-0828. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request.

If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us at [privacy@insightglobal.com](mailto:privacy@insightglobal.com).

If you choose to use the [Global Privacy Control](#) (“GPC”) browser signal, you will only be opted out of online sales or sharing of personal information, and will need to turn it on for each browser you use. Disabling all cookies will also only opt you out of online selling or sharing relating to cookies. To submit a request to opt out of sales and sharing which would not otherwise be controlled by GPC or cookies, please use our webform or call us at the contact information above.

Notice of Financial Incentive. We do not offer a financial incentive for the collection, retention, sale, or sharing of personal information.

Metrics. We are not subject to the requirement to compile and report metrics regarding its responses to consumer requests during the prior calendar year.

**Other Consumer Rights Information.** Under California Civil Code Section 1789.3, we are required to provide California residents with the following information:

- Unless otherwise expressly stated, this Site is provided without charge.
- To file a complaint regarding this Site or to receive further information regarding use of this website, please contact us via email at [privacy@insightglobal.com](mailto:privacy@insightglobal.com). You also may contact the Complaint Assistance Unit of the Division of Consumer Services of California's Department of Consumer Affairs in writing at 400 R Street, Suite 1080, Sacramento, California 95814 or by telephone at (916) 445-1254 or (800) 952-5210.

**Removal of Content.** If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to [privacy@insightglobal.com](mailto:privacy@insightglobal.com). Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

## Nevada Privacy Rights

If you are a Nevada resident, you may request that we stop selling certain categories of personal information that we collect. To submit a request please use our webform or call us toll free at 1-833-742-0828. For all requests, you must provide us with your name, email address, phone number, and mailing address so that we can verify your identity by matching the information we have collected against the information you have provided. Failure to provide all of the foregoing information may prevent us from processing your request.

## Virginia Privacy Rights

Your Rights. Subject to certain exceptions and limitations, the Virginia Consumer Data Protection Act (VCDPA) affords Virginia consumers the following rights:

- You have the right to request that we confirm whether or not we are processing your personal data and to access your personal data.
- You have the right to obtain a copy of your personal data in a portable and, to the extent technically feasible, readily usable format that allows the you to transmit the data to another controller without hindrance, where the processing is carried out by automated means.
- You have the right to correct inaccurate personal data that we hold about you, taking into account the nature of the personal data and the purposes of the processing of the data.
- You have the right to request that we delete personal information that we have collected from you or obtained about you. We may not delete all of your personal information if one of the exceptions to the VCDPA applies.

- You have the right to opt out of the processing of the personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

Exercising Your Rights. To exercise any of your rights, please use our webform or call us toll free at 1-833-742-0828. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request.

Appealing Our Decision. If we refuse to take action on your request, you may appeal our decision within a reasonable period of time, not to exceed 90 calendar days from the date of your receipt of our response. You may exercise your appeal rights by emailing us at [privacy@insightglobal.com](mailto:privacy@insightglobal.com).

## Canada Privacy Rights

Your Rights. If you are a resident of Canada, subject to certain exceptions and limitations, you have the following rights:

- You have the right to request that we inform you of the existence, use, and disclosure of your personal information and provide you with a copy of that personal information within the timeframes provided for by law.
- If the personal information we hold about you is inaccurate or incomplete, you have the right to have it rectified.
- You have the right to contact us to request information about our data processing activities, namely what personal information was collected from you and how we process it. You may ask us to clarify the categories of third-parties that have access to your personal information and the applicable retention period for that information.
- You have the right to withdraw that your consent to our collection, use, and disclosure of personal information at any time. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Exercising Your Rights. To exercise any of your rights, please use our webform or call us toll free at 1-833-742-0828. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request.

## Contact Us

If you have any questions about this Policy or our data practices, please email us at [privacy@insightglobal.com](mailto:privacy@insightglobal.com). You can also write to us at:

Insight Global  
Attention: Data Privacy Officer  
1224 Hammond Drive, Suite 1500  
Atlanta, Georgia 30338

## Updates to Our Privacy Policy

From time to time we may change our privacy policy. We will notify you of any material changes to our privacy policy as required by law. We will also post an updated copy on the website where this appears. Please check our website periodically for updates. The “Last Updated” legend above indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on any of our Sites.