

Privacy Policy

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Version: 9 October 2024

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Introduction

Cognism Limited has prepared this Privacy Policy to describe: (i) what personal information or personal data (“personal data”) we collect, (ii) how we use and share personal data and (iii) your choices in relation to our privacy and personal data practices.

If you have any questions or comments about this Privacy Policy, please contact us at:

- Telephone: +44 20 3858 0822
- Email: privacy@cognism.com
- Registered address: Cognism Limited (UK), [C/O Worldwide Corporate Advisors, 150 Minories, London, England, EC3N 1LS](#)

PLEASE NOTE: IF YOU ARE A RESIDENT OF US STATES WITH PRIVACY LAWS CLICK [HERE](#) FOR OUR STATE-SPECIFIC PRIVACY POLICY TO FIND OUT MORE ABOUT YOUR PRIVACY RIGHTS UNDER THE APPLICABLE STATE LAW(S).

Applicability

We provide a suite of products and services pursuant to the respective order document to our customers (“**Customers**”) on a software-as-a-service basis, such as our sales intelligence platform (the “**Cognism Platform**”) or our applications (e.g. browser extensions) (collectively referred to as the “**Services**”). This Privacy Policy applies to personal data that we collect, use, disclose and otherwise process in connection with the Services, our website(s) (including <https://www.cognism.com/>) (“**Website**”), and any other products and/or services that specifically link to this Privacy Policy, from you, public sources or third-party vendors.

If you are a Customer of Cognism, this Privacy Policy does not apply to personal data that we process on your behalf (if any) as your service provider. Such personal data shall instead be governed by the terms and conditions of the separate customer agreement or terms of service that you have agreed to with Cognism.

Our Services are designed for businesses and are not intended for personal, family, or household use. Accordingly, we treat all personal data covered by this Privacy Policy as pertaining to individuals acting as business representatives, rather than in their personal capacity.

Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your personal information with us and exercising your rights under the applicable laws.

You can exercise your right to opt-out at any time from the Cognism Platform in the Cognism [Privacy Centre](#). For more information, please refer to Section 9.

1. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

➤ Cognism, as data controller

Cognism acts as a data controller, as described in this Privacy Policy, when we collect and use information about data subjects who are visitors to our Website and Services, as well as when we collect and use information about data subjects for purposes of creating, providing and maintaining our Services.

➤ our Customers, as data controller

When our Customers use our Services, they are acting as the data controller and are responsible for ensuring that personal information collected about data subjects is being processed lawfully, and specifically, for::

- ensuring that personal information collected about data subjects is being processed lawfully;
- determining whether and how they wish to use our Services, and for ensuring that all third-party individuals that are a visitor to or user of a website, application, or service on which a Customer uses our Services have been provided with adequate notice regarding the processing of their personal information, have given informed consent where such consent is necessary or advised, and that all legal requirements applicable to the collection, use, or other processing of personal information through our services have been met by such Customers;
- handling data subject rights requests under applicable law, by their users and other individuals whose data they process through the services.

In the context of and depending on the Services provided to our Customers, Cognism may either be controller or processor.

2. WHAT TYPES OF PERSONAL DATA DO WE PROCESS (FOR OUR WEBSITES VISITORS AND CUSTOMERS)?

Types of data	Examples of data	Data sources
Enquiry data (information we receive when you contact us about our Services or request a demo on our Website)	<ul style="list-style-type: none"> • Full name, • Location and contact details (such as email address), • The organisation on behalf of whom you are contacting us (e.g. prospective client), • Other personal data you may provide us in your email or contact form. 	<ul style="list-style-type: none"> - We collect this information from you

<p>Account data (information we receive when the Customer enters into a relationship with us, and when your account on our Services is set-up)</p>	<ul style="list-style-type: none"> • Username, • Full name, • Employer/Customer, • Contact details (such as email address, phone and address details), • Password 	<ul style="list-style-type: none"> - We collect this information from you or the Customer
<p>Marketing data (information we process about you to send you/the Customer marketing communications)</p>	<ul style="list-style-type: none"> • Full name, • Employer/Customer, • Contact information (such as email address) 	<ul style="list-style-type: none"> - We collect this information from you or the Customer
<p>Analytics data (information we collect and process about how you interact with our Website and Services)</p>	<ul style="list-style-type: none"> • Number of visitors, pages visited, time spent per page; • Page interaction information, such as scrolling, clicks and browsing methods; • Approximate location or country indicating traffic on the website; • Websites where visitors have come from and where they go afterwards; • Page response times and any download errors; • Other technical information relating to end user device, such as browser type, IP address or browser plug-in, or to the use of the Services (access or event logs, metadata etc.). <p>For more information about the use of cookies and other trackers on our Website and to adjust your cookie preferences, please see our Cookie Policy.</p>	<ul style="list-style-type: none"> - Automatically collected by our Website and Services

3. WHAT TYPES OF PERSONAL DATA DO WE PROCESS (FOR THE BUSINESS CONTACTS IN OUR COGNISM PLATFORM)?

Types of data	Examples of data	Data sources
<p>Data relating to professional activity (business contact and similar information related to individuals when they are acting in their professional or employment capacity)</p>	<ul style="list-style-type: none"> • Full name; • Professional contact information (telephone number, email); • Employer company & company details (including alias, size, industry, website); • Approximate employer or office location (e.g. country, state or city); • Job title (where you have moved jobs, we may hold your employment history: previous employers and previous titles) and information about skills which may be published through professional networking services and other sources • LinkedIn URL. <p>Cognism does not seek to collect any non-business-related data for the Cognism Platform such as date of birth, home address, personal email or home telephone number and Cognism does not collect sensitive personal data.</p>	<p>We collect this information from:</p> <ul style="list-style-type: none"> • Correspondence with you (by email or phone); • Publicly available sources such as business and employment-oriented social networks (e.g. LinkedIn), recruitment websites and company websites; • Third parties such as our Customers, (including through software integration), recruiters and other data providers or vendors. <p>As Cognism requires a business email address to be recorded against profiles in its Cognism Platform, to provide certain aspects of its Services, where Cognism does not have the business email address of a profile, it may generate a business email address based on the email address structure understood to be implemented by the employer company.</p>

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4. FOR WHICH PURPOSES IS YOUR DATA PROCESSED BY COGNISM?

➤ **Data regarding our Website visitors and Customers**

Purposes	Examples of use of your personal data	Legal bases
Online requests, communications and advertising		
<p>Managing your enquiries</p>	<ul style="list-style-type: none"> to process your enquiries (demo or contact requests, etc.) to reply and provide support, including providing you and/or your organisation with information about the Services. 	<p>Our legitimate interest to manage our users, prospective clients and Customers enquiries</p>
<p>Direct marketing communications and advertising</p>	<ul style="list-style-type: none"> to send postal, phone, electronic or email communications to our Customers and prospective Customers, including via our mailing list with information on news, offers, and updates about Cognism (see Section 9 of this Privacy Policy) for how to unsubscribe); to conduct remarketing for Cognism, which allows us to show Cognism ads to people who've previously visited our website; to conduct advertising on social networks for Cognism, which means that if you link to one of our social media platforms you may be subject to targeted marketing displaying Cognism ads via that site. 	<p>Our legitimate interest to develop our business activities with professionals.</p> <p>If required by applicable law, we will request your consent for electronic marketing communications.</p> <p>For more information on your opt-out rights, please refer to section 9 of this Privacy Policy.</p> <p>For more information on how we work with the third-party advertising networks and social media platforms, please refer to our Cookie Policy. If you would like to find out more</p>

		about the way these third parties collect and process your information, please refer to their respective privacy policies.
Promotions and sweepstakes	<ul style="list-style-type: none"> to facilitate contests, sweepstakes, and promotions, process entries, and deliver reward. 	Our legitimate interest to organize promotions for our prospective clients and Customers
Providing our Services		
Providing our Services	<ul style="list-style-type: none"> to administer our Website and deliver our Services to our Customers or their customers under the agreed terms of service, including support; to send technical notices, updates, and support and administrative messages. 	Our legitimate interest to provide our Services in compliance with the agreements with our Customers
Managing your employment application	<ul style="list-style-type: none"> to communicate about Cognism employment opportunities; to communicate your employment application to the Cognism entity concerned by the employment offer; to examine your application; if you are a successful applicant, to organize an interview to assess your professional ability and skills. 	To take steps prior to entering into a contract

➤ **Data regarding the business contacts in our Cognism Platform**

Purposes	Examples of use of your personal data	Legal basis
Providing our Services to our Customers	<ul style="list-style-type: none"> to provide, maintain and build our Cognism Platform with professional data; 	Cognism legitimate interest to provide our Services, and Customers legitimate interests to (including Cognism legitimate

	<ul style="list-style-type: none"> • to verify, cleanse, update and maintain professional data provided through our Services; • to deliver, maintain and improve our Services. 	<p>interest to enable its Customers to obtain up-to-date and complete information about potential business customers organized in one searchable data, to identify the individual that occupies a certain role within a B2B lead, to only reach out to relevant contacts, to generate and contact potential B2B leads in order to undertake forms of B2B marketing,</p>
<p>Conduct studies, researches and statistical analyses</p>	<ul style="list-style-type: none"> • to undertake research and compile statistical aggregated reports based on data held in Cognism’s Platform (which may include inferred non-personal data, or anonymized or pseudonymized data (rendered non-personal and non-identifiable), 	<p>Our legitimate interest to conduct studies, researches and statistical analyses, including for the purpose of understanding patterns and trends.</p>
<p>Direct marketing communications and advertising</p>	<ul style="list-style-type: none"> • to run our own marketing campaigns and promote our Services. 	<p>Our legitimate interest to develop our business activities with professionals</p> <p>If required by applicable law, we will request consent for electronic marketing communications.</p> <p>For more information on opt-out rights, please refer to section 9 of this Privacy Policy.</p> <p>For more information on how we work with the third-party advertising networks and social media platforms, please refer to our Cookie Policy. If you would like to find out more about the way these third parties collect and process</p>

		your information, please refer to their respective privacy policies.
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In addition, the business contacts from our Cognism Platform is generally used by our Customers, as data controller (see Section 1 of this Privacy Policy), for the purposes of:

- contacting (or enabling their own customers to contact) individuals on their business telephone, at their business email address or other electronic mail or otherwise serving (or enabling their own customers to serve) relevant display ads on social networks (such as Facebook, LinkedIn and Instagram) and other services, in order to market products and/or services;
- enriching (or enabling their own customers to enrich) their existing customer relationship management records and receive timely updates of changes; and
- receiving studies, researches and statistical analyses from Cognism.

As Customers will act as data controllers, they have their own privacy policies and opt-out options, and we recommend you review them. Where Cognism has made personal data available to its Customers, the Customer’s privacy policy should list Cognism as a data source.

➤ **Data regarding all type of data subjects**

Purposes	Examples of use of your personal data	Legal basis
Improving the Services	<ul style="list-style-type: none"> • to analyse, evaluate, maintain and improve the Website and the Services; • to facilitate the use on our Website and Services. 	Our legitimate interest to improve the Website, the Services, and the user experience
Ensuring the security of our Services	<ul style="list-style-type: none"> • to monitor our Website and Services in order to prevent and detect security risks; • to send security updates and alerts, and security maintenance messages; • preventing, investigating and detecting crime, fraud and prosecuting offenders, including working with law enforcement agencies. 	Our legitimate interest to ensure the security of our Website and Services and to prevent and detect fraud.
Pre-litigation or litigation management	<ul style="list-style-type: none"> • to take action against any identified breach, including informing relevant third-parties 	Our legitimate interest to defend our rights and interests

	<p>such as law enforcement agencies;</p> <ul style="list-style-type: none"> to manage any dispute or litigation. 	
Compliance with legal and regulatory obligations	<ul style="list-style-type: none"> to comply with applicable legal and regulatory obligations to manage your requests when you exercise your rights. 	Our legal and regulatory obligations

5. WHO DO WE SHARE YOUR DATA WITH?

We will share your information, on a limited and need-to-know basis, with the following recipients:

Recipients	Purposes
Cognism and its duly authorized employees	For the administrative, operational and commercial management of the Website and Services as indicated in Section 4 of this Privacy Policy.
Other Cognism affiliates	<p>For the global management of the Website and Services operated by Cognism, where the Cognism affiliates (Cognism Inc (US), Cognism Software BC Ltd (Canada), Cognism d.o.o (Croatia), Cognism DOOEL Skopje (Macedonia), NESTAG GmbH (Germany), Cognism GmbH (Germany), Maltastic Limited (UK), KASPR SAS (France)) can act as processors or subprocessors, respectively.</p> <p>As applicable, for transmitting the employment application to the Cognism entity concerned by the employment offer, so the Cognism entity can examine your employment application and contact you.</p>
Cognism Customers	<p>Business contacts data is provided to the Customers (or their customers), as part of the offering of our Services, through limited access to the Cognism Platform, and/or disclosure to a Customer's software or solutions as requested or directed by our Customers.</p> <p>The Customers process this data as data controllers for the purposes summarized in Section 4 of this Privacy Policy, as further described in their privacy policies. By remaining in the Cognism Platform, you may be contacted by our Customers, as data controllers, when they are</p>

	conducting their business-to-business sales, marketing, and recruiting activities.
Suppliers, subcontractors, service providers	<p>For operational and technical purposes related to operating the Website and its Services, insofar as is necessary for suppliers, subcontractors and service providers to assist us in carrying out business activities.</p> <p>This category includes external third-party service providers, such as outside professional advisors, IT systems, support and hosting service providers, technical engineers, data storage and cloud providers and similar third-party vendors and outsourced service providers.</p>
Professional advisers and all interested parties	Exclusively in the case of the management of possible disputes and other legal matters where appropriate.
Administrative or judiciary authorities	Exclusively in case of an express and justified request from them or in case of an alleged violation of legal or regulatory provisions, and to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).
Other third parties such as potential acquirers or investors	If we are involved in a restructuring operation, merger, acquisition, sale of all or a portion of our assets or a similar transaction, as well as in case of insolvency, bankruptcy or receivership, where personal data are transferred to one or more third parties as assets of Cognism.

6. WILL YOUR PERSONAL DATA BE TRANSFERRED OUTSIDE OF THE EUROPEAN UNION/EUROPEAN ECONOMIC AREA?

As far as possible, your personal data will be stored and kept inside the UK, Switzerland and the European Economic Area (together, the “EEA”). However, due to the nature of our global business and the technologies required, your personal data may be transferred to third party service providers, Customers or affiliates outside the EEA, in third countries.

In the event that the third country does not ensure a adequate level of protection of personal data, Cognism ensures that the appropriate safeguards to protect your personal data (in particular standard contractual clauses) in the absence of a decision of adequacy and after having carried out an assessment of the level of

protection of your rights in the third country. **A copy of such safeguards can be obtained by sending an email directly to Cognism (see contact details in the introduction of this Privacy Policy).**

Name of the recipient	Third country	Adopted safeguards
Cognism Inc.	United States	Standard contractual clauses
AWS	EEA servers	Data Privacy Framework

7. FOR HOW LONG ARE YOUR PERSONAL DATA STORED?

As a general rule, your personal data will only be retained for the period necessary for the accomplishment of the purposes for which said data was collected, or as necessary to fulfill legal or regulatory obligations.

In the absence of applicable exceptions, Cognism will keep your personal data for **the duration of the applicable statutory limitation period** for the data processed for evidence purposes, including the personal data related to applicants in the event of unsuccessful job application (where applicable).

8. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

If you are based in the EU/ EEA/UK, you have the following rights over the way we process personal data relating to you. To make a request, please contact us using the above contact details, addressed to the Data Protection Officer.

Your rights	Scope of your rights
Right to access	You have the right to request: <ul style="list-style-type: none"> ➤ the confirmation on whether Cognism processes your personal data or not; ➤ a copy of such personal data; and ➤ information on the use of your personal data by Cognism in a clear, transparent and understandable way (as provided in this Privacy Policy).
Right to rectification	You have the right to request the rectification of your personal data, to obtain the modification of your personal data if your personal data is obsolete, inaccurate or incomplete.
Right to delete	You have the right to request the deletion of your personal data (or right to be forgotten) , when one of the following conditions applies: <ul style="list-style-type: none"> ➤ you object to the processing of your personal data and there are no overriding legitimate reasons justifying that Cognism must continue processing your personal data (e.g., legal obligation); ➤ you object to marketing activities; ➤ you decide to withdraw your consent on which the processing is based;

	<ul style="list-style-type: none"> ➤ your personal data are no longer useful for the original purposes for which it was collected or for any other type of processing; ➤ the use that is made of your data does not comply with the applicable legal or regulatory provisions.
<p style="text-align: center;">Right to restriction of processing</p>	<p>You have the right to request the restriction of the processing during a limited period of time, in particular in order to carry out some verifications, where one of the following conditions applies:</p> <ul style="list-style-type: none"> ➤ you contest the accuracy of your personal data, the processing of which is thus restricted for the period necessary for Cognism to verify the accuracy of such personal data; ➤ the processing is unlawful and, rather than requesting their deletion, you prefer to restrict their use; ➤ Cognism no longer needs your personal data for the purposes of the processing, but you need them for the establishment, exercise or defense of legal claims; ➤ you have objected to the processing, which is thus restricted pending the verification of whether the compelling legitimate grounds of Cognism may override your interests, rights and freedoms.
<p style="text-align: center;">Right to data portability</p>	<p>You have the right to request a copy of your personal data in a structured, commonly used and machine-readable format and also can request their transmission to another data controller where technically feasible. This right is not exercised in all circumstances, it applies only if it fulfils all the following conditions:</p> <ul style="list-style-type: none"> ➤ your request is only related to your personal data (excluding anonymous or third party data); ➤ your request does not adversely affect the rights or freedoms of others, in particular those of Cognism (e.g., trade secrets) those of third-parties (e.g., intellectual property right); ➤ the processing is carried out by automated means (paper files are therefore not included); ➤ the processing is based on consent or the performance of a contract (to check if it is the case, you can see the Section 3 of this policy). <p>In case of applicability of this right, we will help you to move, copy or transfer your personal data to other IT systems. If you request, Cognism will supply you with the relevant personal data in CSV format. Where it is technically feasible, you can ask us to send this information directly to another IT system provider if you prefer.</p>

<p>Right to object</p>	<p>You have the right to object to our processing of your personal data at any time if the processing is based on our legitimate interest. Cognism will no longer process your personal data, unless they demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, such as the respect of a legal obligation or for the establishment, exercise or defense of legal claims.</p> <p>For more information on how to opt-out from the Cognism Platform, please go to the Cognism Privacy Centre and/or see Section 9 of this Privacy Policy.</p>
<p>Right to withdraw your consent</p>	<p>You have the right to withdraw your consent when it has been obtained, without this withdrawal affecting the lawfulness of the personal data processing operations previously carried out.</p>
<p>Your testimonials</p>	<p>We might display personal testimonials of Customers on our Website in addition to other endorsements. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at support@cognism.com, or contact your Sales or Marketing representative at Cognism.</p>
<p>Other rights</p>	<p>Depending on your country of residence, you may have additional local rights with respect to our processing of your personal data. For example, if you are based in France you can define either general or specific guidelines regarding your personal data in the event of your death (e.g., their deletion or transmission to any person of your choice). You may revoke your instructions at any time.</p>

It is specified that the exercise of these rights is based on the legal basis of the processing as indicated in Section 4 of this Privacy Policy, as follows:

	Access	Rectification	Erasure	Restriction	Data portability	Objection
Consent	Yes	Yes	Yes	Yes	Yes	Withdrawal of consent
Steps prior to entering into a contract			Yes		No	
Contract			Yes		No	
Legitimate interest			Yes		Yes	
Legal obligation			No		No	

Under certain circumstances, **Cognism may ask you for specific information in order to confirm your identity and ensure the exercise of your rights.** This is another appropriate security measure to ensure that personal data is not disclosed to an individual who does not have the right to receive it.

If needed, you may also **lodge a complaint with your national data protection authority:** the supervisory authority for Cognism Limited is the Information Commissioner's Office. Further information, including contact details, are available at <https://ico.org.uk>.

This right may be exercised at any time and free of charge, at the exclusion of potential postal fees or expenses related to legal representation or assistance should you choose to engage third party assistance for the procedure.

9. HOW TO OPT-OUT FROM THE COGNISM PLATFORM?

If you want to permanently erase your data from the Cognism Platform, please:

- complete the form at the Cognism [Privacy Centre](#) (recommended); or
- contact us using the above contact details.

Please note that we need the information included in this form to be able to locate you in the Cognism Platform and action your request. The information provided will only be used to process and action your request. Your request will be processed in the shortest time possible and within the timeframes set forth in GDPR.

Where you receive a marketing email from us, and you would like to be removed from that mailing list please let us know by clicking unsubscribe at the bottom of any marketing email that you receive from us.

10. WHAT HAPPENS IF CHILDREN USE OUR WEBSITE?

We do not knowingly solicit data from or market to children under the age of 18. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at privacy@cognism.com. We will delete such information from our files within a reasonable time.

11. HOW DOES COGNISM PROTECT YOUR PERSONAL DATA?

Cognism is committed to keeping your personal data safe and secure from unauthorised access to or unauthorised alterations, disclosure or destruction of information that we hold. We will take all reasonable technical and organisational precautions to prevent the loss misuse or alteration of your personal data.

Cognism ensures that all members of its personnel and any other person processing your personal data will respect the internal rules and procedures related to the processing of your personal data. In this context, Cognism reviews and updates its practices regularly to enhance your privacy.

Our security measures include:

- hashing and encryption of our services and data;
- regular review of information collection;

- encryption of our services and data;
- restricted access of data to employees, contractors and agents; and
- internal policies setting out our data security.

Please be aware that, although we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches. **If you have found a vulnerability or would like to report a security incident**, you may send an email to us, using the contact details above.

12. TRUSTe FEEDBACK AND RESOLUTION SYSTEM

To the extent you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) [HERE](#).

13. CHANGES TO THIS POLICY

We may update this Privacy Policy and its last updated date to reflect changes to our data governance practices. Therefore, we recommend that you consult this policy each time you access the Website. We will notify you of any changes to this Privacy Policy by email and/or notice on the website, as appropriate.