

PRIVACY POLICY

Sales Impact Academy respects your privacy and is committed to protecting your personal data.

This privacy policy provides you with details of how we use (“process”) your personal information as described in Section 2 (“Personal Information”) that we collect when you visit our Website (regardless of where you visit it from) or interact with us in any other way.

1. IMPORTANT INFORMATION

“Sales Impact Academy”, “SIA”, “we”, “us” or “our” refers to Sales Impact Academy, Inc., Sales Impact Academy Limited and our corporate affiliates.

SIA is the data controller and is responsible for your Personal Information. This policy applies to the Personal Information described in Section 2, in Sales Impact Academy’s role as a data controller, and applies only to sites and services under our control. This policy does not apply to any content, data or information processed, stored, or hosted on behalf of our business customers (each, a “Customer”; collectively, “Customers”), as part of the SIA products and services described on one or more applicable order forms. In such case Sales Impact Academy is a data processor for its customers and the terms of our Data Processing Addendum will apply to such processing.

You do not have to give us any personal information in order to use this website. However, if you wish to register on this site, subscribe to a service, webinar or event, enquire about a product or service, sign up to our newsletter or take part in a specific promotional campaign, prize draw or competition, we may collect Personal Information including but not limited to: your name, email address, phone number, job title, company name and country location.

Please note in particular that:

1. We monitor and record electronic communications to ensure compliance with applicable rules and law and our internal policies, and for business continuity purposes.
2. We use cookies, web beacons and similar technologies (together “Cookies”) on our website and in marketing emails to help us manage and improve our website, your browsing experience, and (where you are known to us) the material/information that we send you. Where Cookies are placed by third parties (such as Google Analytics), your Personal Information may: (a) be processed by that third party in another jurisdiction for its own purposes; and (b) accessible to local government authorities.
3. As a global business, we will share certain Personal Information with our global employees and consultants, and select third parties, subject to appropriate safeguards.
4. Our services are designed for businesses and are not intended for personal or household use. Accordingly, we treat all Personal Information covered by this Privacy Policy,

including information about any visitors to our Website, as pertaining to individuals acting as business representatives, rather than in their personal capacity.

If you do not wish to provide us with your personal data, or to have it processed by us or any of our Sub-Processors, please do not provide it to us and avoid any interaction with us or with our Website, or use our products or services.

2. WHAT DATA DO WE COLLECT ABOUT YOU?

The categories of Personal Information we collect will vary, depending on our specific relationship with you, and the context.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Personal Information, means any information about an individual from which a person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Information about you which we have grouped together as follows:

Type of Data	Examples
Identity Data	Your first name, last name, username or similar identifier.
Contact Data	Your business address, email address and telephone numbers
Technical Data	Your login data, internet protocol (IP) addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
Profile Data	Your interests, preferences, feedback and survey responses.
Usage Data	Information about how you use our website, products and services
Marketing and Communications Data	Your preferences in receiving marketing communications from us and our third parties and your communication preferences

We do not collect any Special Categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data), nor do we collect any information about criminal convictions and offences.

3. HOW WE COLLECT YOUR PERSONAL INFORMATION

You will voluntarily provide most of your Personal Information directly to us. We may also obtain Personal Information from other sources or persons, including:

Public Information

Personal Information about you or your business that is publicly available, for example on your or your employers' website, public professional social networking sites, the press, and relevant electronic data sources.

Information From Third Parties

Personal Information provided to us by third parties (for example by our or your customers; agents; suppliers; advisers; consultants, professional experts; counter-parties; previous, current and future employers; correspondents and enquirers; regulators and public authorities; and other persons) where such Personal Information is provided to us in connection with the relevant purposes set out in this Privacy Policy.

Information Collected Through our Website

We use Cookies on our website and certain marketing emails which collect your IP address and certain other information from you when you visit our website. For further details, please see the 'Cookies' section below.

We may also automatically collect information about the website you came from or are moving to, the pages you visit on our website, IP address data, the type of browser used and the time of site access. This information will be aggregated and not used to identify you directly.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at

marketing@salesimpact.io

4. HOW WE USE YOUR PERSONAL INFORMATION

Our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it. However, we will normally collect Personal Information from you only where we have your consent to do so, where we need the Personal Information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Information from you.

Our processing of your Personal Information will include obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, copying, analysing, amending, retrieving, using, systemising, storing, disclosing, transferring,

retaining, archiving, anonymising, erasing or destroying it by automated or non-automated means.

Legal Basis for Processing Personal Information

The EU or UK General Data Protection Regulation (“GDPR”) requires us to communicate to you the purposes for which we Process your Personal Information, together with the corresponding ‘Legal Basis’. We may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your data as set out in the table below.

Purpose/Activity	Type of data	Legal basis for Processing
To register you as a prospective new customer	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests to keep our records updated and to analyse how customers use our products / services
To enable you to complete a survey, poll or Q&A	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how customers or prospective customers use our services, require from our services, to develop them and grow the business)
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services and network security (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to analyse how customers use our products / services to develop and grow the business.

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business
To comply with any other obligation to which we are subject under applicable rules and law.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary to comply with a legal obligation

We consider that our legitimate interests and the uses above are proportionate, and compatible with your interests, legal rights or freedoms.

MARKETING COMMUNICATIONS

We generally rely on our legitimate interests to process your Personal Information for marketing purposes.

You will receive relevant marketing communications from us if you have:

- requested information from us or purchased goods or services from us; or
- if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- in each case, you have not opted out or unsubscribed from receipt of that marketing.

To the extent applicable laws require consent, your provision of Personal Information to us will be deemed as confirmation of your consent to such processing where appropriate. Where required, we will also ask you to provide your explicit written consent.

THIRD PARTY MARKETING

We will obtain your express opt-in consent before we share your Personal Information with any third-party for marketing purposes.

If you attend an event or webinar organized by us, or download or access an asset on our Website related to such an event, webinar or other activity involving third-party sponsors or presenters, we may share your Personal Information with them. If required by applicable law, you may consent to such sharing via the registration form. In these circumstances, your Personal Information will be subject to the sponsors' privacy statements. If you do not wish for your Personal Information to be shared, you may choose to not opt-in via event/webinar registration or elect to not have your badge scanned, or you can opt-out as set out in "Changing Your Marketing Preferences" below.

CHANGING YOUR MARKETING PREFERENCES

You can change your preferences for receiving group marketing emails and other information from us by clicking on the 'manage preferences' link in a Sales Impact Academy marketing email.

You also have the right to ask us not to process your Personal Information for marketing purposes - and can exercise the right at any time by sending us an email at marketing@salesimpact.io.

Where you opt out of receiving our marketing communications, this will not apply to Personal Information provided to us as a result of a product/service purchase, product/service experience or other transactions or where we have a legal obligation to retain your data.

5. COOKIES

We use Cookies on our Website to make sure the site functions as it should (e.g., to ensure images display correctly, to store your preferences, and to prevent errors).

Where you agree to Cookies through our website cookies banner, and/or click on a link or other direct mailing from us, we will also use certain Cookies to:

- Analyse how our website and online services are performing; and
- Personalise the content that you see on our website (and, where you are known to us, that we send you), based on your previous use of the website.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Please note that some of the Cookies on our website are third party Cookies (e.g., Google advertising cookies) which we do not control.

For more information about cookies and how to disable and/or delete them, please visit www.aboutcookies.org

6. HOW IS YOUR PERSONAL INFORMATION SHARED?

Employees

Your Personal Information will, where appropriate, be shared with our relevant employees and consultants (or groups of them), who may be based in any of our locations. We employ a principle of least privilege at all times.

Third Parties

We use third party service providers as described in Section 11 (collectively “Sub-Processors”) to support our websites, products, and services. For example, we use service providers for data hosting, application development, and marketing. We may need to share your information with service providers to provide information about products or services to you. These Sub-Processors are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information. In all cases where we share your information in this way, we require all third parties to whom we transfer your data to respect the security of your Personal Information and to treat it in accordance with the law.

Forums

Our Website may offer message boards, blogs, and community forums. Please keep in mind that if you directly disclose any information through our message boards, blogs, or forums (including profile information associated with the account you use to post the information) it may be read, collected and used by anyone who accesses these websites. Your posts and certain profile information may remain even after you terminate your account. We urge you to consider the sensitivity of any information you may disclose in this way. We will correct or delete any information you have posted if you so request. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

Legal Compliance

We may disclose or allow government and law enforcement officials access to your Personal Information, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect our legitimate business interests, including the security or integrity of our products and services.

SIA Subsidiaries and Affiliated Companies

We may share Personal Information internally within our group, for the purposes described in this Privacy Policy.

Business Transfer

Should SIA or any of its subsidiaries or affiliates undergo any change in control or ownership, including by means of merger, acquisition or purchase of substantially all or part of its assets, personal data may be shared with or transferred to the parties involved in such an event. We may disclose Personal Information to a third-party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal Information may also be disclosed in the event of insolvency, bankruptcy or receivership.

For the avoidance of doubt, SIA may share Personal Information in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data non-personal, non-identifiable and anonymous. We may transfer, share or otherwise use non-personal and non-identifiable data at our sole discretion and without the need for further approval.

7. DATA STORAGE AND SECURITY

We and our authorized Sub-Processors maintain, store and process personal data in the United States of America, Europe, Canada and other locations, as reasonably necessary for the proper performance and delivery of our services, or as may be required by law. SIA is committed to protect personal data in accordance with this Privacy Policy and customary industry standards, and such appropriate lawful mechanisms and contractual terms requiring adequate data protection, regardless of any lesser legal requirements that may apply in the jurisdiction to which such data is transferred.

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality.

We keep these arrangements under regular review, taking into account security and compliance best practices, current risks, threats, vulnerabilities, mitigating controls, technology, and changes in applicable legal requirements.

However, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Information transmitted to our website – and any such transmission is at your own risk.

8. DATA BREACHES

If a data breach (leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, your Personal Information) occurs which is likely to result in a high risk of adversely affecting your rights and freedoms, we will inform you of this without undue delay.

9. DATA RETENTION

We will only retain your Personal Information for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data, see Section 10 below for further information.

We may anonymise your Personal Information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Individuals have rights concerning their Personal Information. Please contact us by e-mail at dpo@salesimpact.io if you wish to exercise your privacy rights under any applicable law, including the GDPR, the California Consumer Privacy Act (CCPA), the California Privacy Rights Act (CPRA), or the Virginia Consumer Data Protection Act (VCDPA). Such rights may include – to the extent applicable – the right to know/request access to (specific pieces of personal data collected; categories of personal data collected; categories of sources from whom the personal data was collected; purpose of collecting personal data; categories of third parties with whom we have shared personal data), to request rectification or erasure of your personal data held with us, or to restrict or object to such personal data processing (including the right to direct us not to sell your personal data to third parties now or in the future), or to port such personal data, or the right to equal services and prices (e.g. freedom from discrimination) (each to the extent available to you under the laws which apply to you).

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. If your request relates to Personal Information that may be processed on our Customer's behalf, as their "data processor", note that such Customer

exclusively determines how such data is processed, as well as if and how your request should be handled – so we advise that you submit your request directly to them.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We hope to address any enquiry or request to your satisfaction, but if we do not, you have the right to lodge a complaint with the relevant data protection regulator in the country where you normally live or work, or where an alleged breach of data protection is said to have occurred.

11. ADDITIONAL NOTICES & CONTACT DETAILS

Updates and Amendments: We may update and amend this Privacy Policy from time to time by posting an amended version on our Website. The amended version will be effective as of the date it is published. We will provide prior notice if we believe that the changes involved materially alter your rights, via any of the communication means available to us or via the SIA Platform. After such notice period, all amendments shall be deemed accepted by you.

Requirements under US State Privacy Laws: This policy describes the categories of personal information we may collect and the sources of such information (in Sections 2 and 3 above), and our retention (Section 9) and deletion (Section 9) practices. We also included information about how we may process your information (in Section 4), which includes for “business purposes” under the California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA) and similar state laws, as applicable. We do not sell or “share” your personal information for the intents and purposes of the CCPA or CPRA, nor disclose personal information that we “control” to any third party for their direct marketing purposes. We may disclose Personal Information to third parties or allow them to collect Personal Information from our services as described in Section 6 above, if those third parties are our Customers (in respect of personal data processed on their behalf), or our authorized Sub-Processors or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such Personal Information, or if you direct us to disclose your Personal Information to third parties, or as otherwise described in Section 6 above. You may also designate an authorized agent, in writing or through a power of attorney, to request to exercise your privacy rights on your behalf. The authorized agent may submit a request to exercise these rights by emailing us. We will not discriminate against you by withholding our Services from you or providing a lower quality of service to you for requesting to exercise your rights under the law.

If you have any questions or would like to exercise your rights under any applicable US State privacy laws, you can contact our DPO at dpo@salesimpact.io.

External Links: While our services may contain links to other websites or services, we are not responsible for their privacy practices. We encourage you to pay attention when you leave our Services for the website or application of such third parties, and to read the privacy policies of each and every website and service you visit. This Privacy Policy applies only to SIA services.

Children: Our Services are not designed to attract children under the age of 16. We do not knowingly collect personal data from children and do not wish to do so. If we learn that a person under the age of 16 is using the Services, we will attempt to prohibit and block such use and will make our best efforts to promptly delete any personal data stored with us with regard to such child. If you believe that we might have any such data, please contact us by e-mail at dpo@salesimpact.io.

Data Protection Officer: SIA has appointed a Data Protection Officer for monitoring and advising on SIA’s ongoing privacy compliance and serving as a point of contact on privacy matters for data subjects and supervisory authorities. If you have any comments or questions regarding our Privacy Policy, if you have any concerns regarding your Privacy, or if you wish to make a complaint about how your Personal Information is being processed by SIA, you can contact dpo@salesimpact.io

Contacting Us: Your information is controlled by Sales Impact Academy, Inc. and Sales Impact Academy Limited. If you have any comments or questions regarding our Privacy Policy, or if you have any concerns regarding your Personal Information held with us, please contact our Data Protection Officer at dpo@salesimpact.io.

12. SALES IMPACT ACADEMY SUB-PROCESSORS

Sales Impact Academy uses the following sub-processors to support the delivery of the services and products.

Sub-Processor and Location	Purpose	Data Processed	Privacy Policy/DPA
Zoom Inc., USA	Communication service for video, audio chats and delivery of service.	First Name, Last Name, Email Address	https://zoom.us/privacy https://explore.zoom.us/docs/doc/Zoom_GLOBAL_DPA.pdf
BigMarker LLC, USA	Communication service for video, audio chats and delivery of service.	First Name, Last Name, Email Address, Job Title, Company Name, Country	https://www.bigmarker.com/privacy https://get.bigmarker.com/legal/data-processing-addendum
Slack Technologies Inc, USA	Sales Impact Academy customer communications	First Name, Last Name, Email Address - customer provided data	https://slack.com/intl/en-gb/trust/privacy/privacy-policy https://slack.com/intl/en-gb/terms-of-service/data-processing
Salesforce.com, Inc., USA	Internal management of business and marketing strategy.	May store as our internal CRM; Contact Data, Technical Data, Profile Data, Usage Data and Marketing and Communications Data	https://www.salesforce.com/company/privacy/ https://www.salesforce.com/content/dam/web/en_us/www/documents/legal/Agreements/data-processing-addendum.pdf

HubSpot CRM, USA	Internal management of business and marketing strategy.	Contact Data, Technical Data, Profile Data, Usage Data and Marketing and Communications Data	https://legal.hubspot.com/privacy-policy https://legal.hubspot.com/dpa
Google LLC & Analytics, USA	Google collects information through our use of Google Analytics on our website.	Review privacy policy on what data is collected and how it's processed.	https://policies.google.com/privacy https://business.safety.google/adsprocessor/terms/
Xero, New Zealand	Tracking business financial invoicing and payments with suppliers and customers.	Company Name, Address, Contact Name, Email Address, Telephone Number and possibly any other business information such as VAT Numbers / Company Number.	https://www.xero.com/uk/about/legal/privacy/ https://www.xero.com/uk/legal/terms/data-processing/
GoCardless, UK	For particular customers choosing to pay via this method.	Company Name, Address, Contact Name, Email Address, Telephone Number and possibly any other business information such as VAT Numbers / Company Number.	https://gocardless.com/privacy/
Chargebee Inc., USA	Internal management of customer subscriptions	Company Name, Address, Contact Name, Email Address, Telephone Number and possibly any other business information such as VAT Numbers / Company Number.	https://www.chargebee.com/privacy/ https://www.chargebee.com/privacy/dpa/
Salesbricks, USA	Internal management of customer subscriptions	Company Name, Address, Contact Name, Email Address, Telephone Number and possibly any other business information such as VAT Numbers / Company Number.	https://www.salesbricks.com/privacy

To opt in to updates regarding our Sub-Processors please email legal@salesimpact.io

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