

# Privacy Policy dtw Research, Inc.

Effective: December 13, 2023

## Acceptance of this Privacy Policy

dtw Research, Inc. ("dtw," "we," "us", or "our"). is a pharmaceutical marketing and industry specific resource company.

Your privacy is important to us.

This Privacy Policy (hereinafter, "**Policy**") describes (i) the access, collection, use, retention, disclosure and protection of Personal Information (defined in the section Types of Data Collected below) when you communicate with us and/or visit or interact with <https://www.dtwresearch.com/home/>, <https://cdpromo.dtwresearch.com/>, and associated webpages (hereinafter, the "**Site**"); (ii) your privacy rights; (iii) and how the law protects you and your privacy rights.

This Policy does **not** apply to any comments, troubleshooting questions, suggestions, and the like that you submit to us via our Site. Such information may be shared with third parties, whether by us or by other visitors to our Site. **Accordingly, you agree that you are posting such information at your own risk and you should not post any such information that you do not want shared with others.**

By you or your entering into an Agreement (defined in section BUSINESS PURPOSES ONLY below) with dtw, accessing all or any part of our Site, or by placing a purchase order with dtw through our Site, you and your company expressly consent to and agree to the terms and conditions of this Privacy Policy, including our use and disclosure of your or your company's information in accordance with this Privacy Policy and our Terms of Use [[www.dtwresearch.com/terms/](http://www.dtwresearch.com/terms/)], incorporated herein by reference.

You agree that the limitation of liability provision contained in the Terms of Use [[www.dtwresearch.com/terms/](http://www.dtwresearch.com/terms/)] applies to any and all disputes and claims arising out of or relating to this Privacy Policy, your use of our Site and our products and services offered through our Site, and any information you provide dtw.

**IF YOU DO NOT AGREE, THEN YOU MUST NOT USE OUR SITE TO ACCESS OUR PRODUCTS AND/OR SERVICES. FURTHER, AS A VISITOR TO OUR SITE, YOU ARE ALSO BOUND BY THE TERMS OF USE AND THIS PRIVACY POLICY – REGARDLESS OF WHETHER YOUR COMPANY PURCHASES PRODUCTS OR SERVICES FROM US.**

**IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY OR OUR TERMS OF USE, YOU MUST NOT USE OUR SITE.**

## **Binding Agreement, Applicable Laws, Jurisdiction and Waivers**

Any claims arising out of or relating to this Privacy Policy shall be governed by the laws of the State of Florida, U.S.A., without giving effect to any conflicts of laws provisions. You agree that in the event of any dispute or claim with respect to this Privacy Policy or the privacy or use of your information, the sole and exclusive jurisdiction for bringing any such action shall be in the Florida state courts located in Nassau County, Florida, USA, or the Federal District Court for the District of Florida, and you waive any and all rights to claim inconvenient forum or immunity. **You and dtw hereby waive any and all rights to a jury trial with respect to any claim arising out of or relating to this Privacy Policy or the privacy or use of your information.**

## **BUSINESS PURPOSES ONLY**

**WE ARE A BUSINESS-TO-BUSINESS SERVICE. YOUR INTERACTION WITH US IS NOT A CONSUMER TRANSACTION. OUR PRODUCTS, SERVICES, AND OUR SITE ARE NOT INTENDED FOR INDIVIDUALS FOR THEIR PERSONAL USE.**

Our customers and visitors to our Site are generally owners, employees and/or consultants of or to pharmaceutical companies, marketing research companies, advertising and public relation companies, acting on behalf of those companies.

Access to certain secured areas of our Site is restricted to persons working for or employed by companies that have an agreement with dtw, whether by having

- (i) purchased a subscription;
- (ii) a free trial or a free account;
- (iii) been granted authorized access to our proprietary database pursuant to a three party agreement with dtw and one of our customers;
- (iv) (placed orders with us to receive access to other products and services through our Site for the subject company's business needs or (v) otherwise been granted access to our proprietary database (any of (i), (ii), (iii), (iv) or (v) being referred to herein as an "**Agreement**").

Your use of our Site and our products and services are governed by our Terms of Use [[www.dtwresearch.com/terms/](http://www.dtwresearch.com/terms/)], this Privacy Policy and, where applicable, your company's Agreement with dtw.

**YOU SHOULD FAMILIARIZE YOURSELF WITH THE TERMS OF YOUR COMPANY'S AGREEMENT WITH DTW, AS YOUR MISUSE OF OUR SITE, PRODUCTS AND/OR SERVICES MAY EXPOSE YOU AND/OR YOUR COMPANY TO LIABILITY.**

## **Changes to This Privacy Policy**

Any or all of this Privacy Policy may be changed at any time without notice to you. Your use of our Site, and your use of or access to our products and services immediately after such changes are posted will mean you accept such changes. Therefore, each time you use our Site, or access our proprietary database or other products and services, you should review this Privacy Policy.

If we make material changes to how we treat our users' Personal Information, we will notify your company by email, and you by email if you have an account with us, in each case to the primary email address specified in yours or your company's account, and/or by notice posted on the website requiring click-through consent. We will also update the "Effective" date at the top of this Policy. Users and our customers are responsible for ensuring we have an up to date active and deliverable email address and all users are responsible for periodically visiting our Site and this Privacy Policy to check for any changes.

To update information on your contact information, please contact us via email [pim@dtwresearch.com](mailto:pim@dtwresearch.com) or by mail at dtw Research, Inc., 4812 First Coast Highway, Fernandina Beach, Florida 32034, Attention: Website Caretaker.

## **Children Under the Age of 18**

Our Site is not intended for children under eighteen (18) years of age. The Site and the services, content, information and programs provided or made available on and/or through the Site may not be accessed or used by any individuals who are not at least 18 years of age. No one under age 18 may provide any information to the Site. We do not knowingly collect Personal Information from children under 18. If you are under 18, do not use or provide any information on this Site, register on the Site, or provide any information about yourself to us, including your name, address, telephone number, email address, or any user name. If we learn we have collected or received Personal Information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at [pim@dtwresearch.com](mailto:pim@dtwresearch.com).

## Transfer of Information to the U.S. and other Countries

dtw is based in the United States, and the information we collect is governed by U.S. law. By accessing or using the Site, or otherwise providing information to us, you consent to collection, processing, transfer and storage of information about you in and to the United States. If you are located in or a resident of a country other than the United States, the privacy laws of the United States may not be as comprehensive as or equivalent to the law in your country of residence or where you are located. Please use the contact information below [[pim@dtwresearch.com](mailto:pim@dtwresearch.com)] if you have a question or concern about the policies or manner in which we treat the information we collect from you.

If you are using this Site pursuant to your company's Agreement with us, your company has consented to the transfer of any information to us to enable us to provide to your company its contracted-for services and products. For further information, please speak with your company.

## Links to Other Websites

**THE SITE CONTAINS LINKS TO FACILITATE USER ACCESS TO EXTERNAL OR THIRD-PARTY SITES (SUCH AS THIRD PARTY PAYMENT PROCESSORS), NONE OF WHICH ARE CONTROLLED OR OFFERED BY dtw. THEREFORE, THIRD PARTY SITES LINKED FROM OUR SITE ARE NOT SUBJECT TO THIS PRIVACY POLICY. YOU ARE RESPONSIBLE FOR REVIEWING THE PRIVACY POLICIES OF ANY LINKED THIRD-PARTY SITES TO DETERMINE HOW YOUR PERSONAL INFORMATION WILL BE COLLECTED, UTILIZED, AND PROTECTED BY SUCH THIRD-PARTY SITES.**

**WE HAVE NO CONTROL OVER AND ASSUME NO RESPONSIBILITY FOR THE CONTENT, PRIVACY POLICIES, OR PRACTICES OF ANY THIRD-PARTY SITES OR SERVICES.**

**TO THE FULLEST EXTENT PERMITTED BY LAW, dtw IS NOT RESPONSIBLE FOR ANY CONTENT, FEATURES, OR ACTIVITIES OF ANY LINKED THIRD-PARTY SITES (INCLUDING THEIR PRIVACY PRACTICES). TO THE FULLEST EXTENT PERMITTED BY LAW, dtw IS NOT RESPONSIBLE FOR THE COLLECTION, PROCESSING, OR DISCLOSURE OF PERSONAL INFORMATION COLLECTED THROUGH OTHER WEBSITES. AND, TO THE FULLEST EXTENT PERMITTED BY LAW, dtw DISCLAIMS ANY AND ALL RESPONSIBILITY AND/OR LIABILITY FOR THE CONTENTS, FEATURES, AND ACTIVITIES OF, AND THE COLLECTION AND USE OF PERSONAL INFORMATION BY, SUCH THIRD-PARTY SITES**

## Types of Data Collected

### *Personal Information*

When you use the Site or your company engages us, we may request certain limited personally identifiable information (“**Personal Information**”).

Personal Information may include, but is not limited to, the following:

- first name
- last name
- company phone number
- company postal address
- company email address

**WE DO NOT REQUEST OR KNOWINGLY GATHER PERSONAL TELEPHONE NUMBERS, HOME ADDRESS, OR OTHER SIMILAR INFORMATION THAT IS NOT USED FOR A BUSINESS PURPOSE.**

**PLEASE DO NOT PROVIDE SUCH INFORMATION TO dtw.**

Please see our Terms of Use [[www.dtwresearch.com/terms/](http://www.dtwresearch.com/terms/)] for important information about access credentials.

### *Usage Data*

“**Usage Data**” is data that is collected automatically when any device—such as a computer, a cell phone or a digital tablet (hereinafter, “**Device**”)—accesses or interacts with the Site.

**WHEN YOU USE THE SITE OR PROVIDE INFORMATION TO US, WE DIRECT THAT YOU ONLY DO SO THROUGH COMPANY DEVICES AND NOT PERSONAL DEVICES.**

By way of example, but without limitation, Usage Data may include information such as the following:

- your Device’s Internet Protocol address (hereinafter, “**IP address**”)
- your Device’s operating system type and version number
- your Device’s manufacturer and model
- a Device identifier (such as the Google Advertising ID or Apple ID for Advertising)
- browser type
- browser version
- screen resolution
- other websites you visited before visiting the Site

- general location information, such as your city, state, or geographic area
- the pages of the Site that you visit
- the time and date of your visit
- the time spent on those pages
- other diagnostic data

dtw may also collect information that your browser sends whenever you visit the Site or when you access the Site by or through a Device.

### ***Agreement Information***

This information includes your preferences for e-Alerts, online surveys, CDP: WorldWide Database login information, PMRD reports, and similar items related to the content provided to you by dtw.

### ***Transactional Information***

This information includes all information relating to the purchasing of goods and services from dtw or a Third Party Provider, e.g., a credit card number or order confirmation number. **You should only use corporate account information for purchases of goods and services through our Site. Please do not use your personal account information.**

### **Methods of Data Collection**

There are various methods in which we may collect both Personal Information and/or Usage Data. By way of example but not limitation, we may collect information

- from you directly when you provide it to us (please visit the section [Information You Provide to Us](#) below) when you request information about our products or other inquiries you make to us through the Site
- when you register with the Site (please visit the section [Registration Data](#) below)
- through your use of the Site and links you interact with (please visit the section [Links to Other Websites](#) above)
- through or with service providers (including payment processors) (please visit the section [Who Collects, Processes, Stores, or Views Your Information](#) below)
- when you interact with our social media pages and/or accounts, which use is also subject to the privacy policies of the service provider or payment processor upon which such page or account is hosted
- automatically as you navigate through our Site (please visit the section [Cookies and Tracking Technologies](#) below)

## Information Provided to Us

dtw may collect information, including but not limited to Personal Information and/or Usage Data, that you provide to us.

The information we collect depends on the context of your interactions with us and the Site, the choices you make and the Site features you use.

By way of example but not limitation, this includes

- the information provided at the time when your company or you, on behalf of your company, enters into an Agreement with dtw or transaction with us
- the information you provide by filling in forms on the Site, including, but not limited to, information provided at the time you submit an inquiry to us or report a problem with the Site
- records and copies of your correspondence (including email addresses); **provided that if you contact us, please remember to only provide to us business points of contact, and not personal email, address, or phone numbers.**
- information provided through email and text message
- your responses to surveys that we might ask you to complete for research purposes
- your search queries on the Site

**ALL PERSONAL INFORMATION THAT YOU PROVIDE TO US MUST BE TRUE, COMPLETE AND ACCURATE, AND YOU MUST NOTIFY US OF ANY CHANGES TO SUCH PERSONAL INFORMATION. WE ARE ENTITLED TO RELY UPON YOUR ASSURANCES TO US, SUBJECT TO OUR VERIFICATION WHERE REQUIRED BY LAW.**

**IF YOU DO NOT WISH YOUR COMPANY TO PROVIDE TO US ANY INFORMATION, YOU MUST ADVISE YOUR COMPANY. WE ASSUME NO LIABILITY FOR YOUR COMPANY'S DISCLOSURE OF YOUR PERSONAL INFORMATION.**

## REGISTRATION DATA

To access certain protected areas and products, you are required to be register with the Site and must submit certain information (your "**Registration Data**").

Contact information is collected during the registration process and is part of your Registration Data. dtw requires this information to fulfill and track access to our proprietary database and other services, or other product support issues, notify you of product updates and changes in Site features, and facilitate communications between you and our business partners. Contact information is also needed to access our more advanced Site features such as our proprietary database.

This information helps dtw customize our content and features for you. This information is also studied on an aggregated basis to estimate the size and composition of our audience. Your registration information is voluntary. We do, however, encourage you to provide this information because it helps us optimize our services to your needs.

Where we have given you (or where you have chosen) access credentials, you and your company are responsible for keeping such access credentials confidential.

**YOU ARE STRICTLY PROHIBITED FROM SHARING SUCH ACCESS CREDENTIALS WITH ANY OTHER PERSON, INCLUDING BUT NOT LIMITED TO, OTHER PERSONNEL EMPLOYED OR CONTRACTED BY YOUR COMPANY.**

If you wish to have your Registration Data removed by us, please send an email to [pim@dtwresearch.com](mailto:pim@dtwresearch.com). Please note that you will not then be able to access certain products and services on our Site, including our proprietary database.

Your company may remove your credentials from our system if you are no longer employed by the company, if your company's Agreement granting access to our database is terminated or otherwise.

**dtw ASSUMES NO LIABILITY FOR YOUR COMPANY'S REMOVAL OF YOUR CREDENTIALS.**

## **Who Collects, Processes, Stores, or Views Your Information**

### ***Service Providers***

dtw may engage third party service providers to perform a variety of services and functions, analyze how the Site is used, and provide technical and hosting services for our Site. Service providers may have access to your Persona Information if necessary to perform such services and functions; provided, however, that these service providers they are only authorized to use such Personal Information for the purpose of performing such services and functions and for no other purpose.



## *Payment Processors*

dtw engages payment processors to process online credit card payments for our products and services. By way of example but not limitation, we use Authorize.net, a wholly owned subsidiary of Visa, for payment processing. For more information on how Authorize.net uses your information please visit <https://usa.visa.com/legal/privacy-policy.html>.

Our payment processors collect, store, and process payment information and transactions that (i) have certified that they are Payment Card Industry Data Security Standard (PCI DSS) compliant, and (ii) are committed contractually to maintain Personal Information in accordance with applicable laws.

In connection with the services that these payment processors provide, these payment processors may collect and store your information necessary to process a transaction (e.g., including your name).

**PAYMENTS SHOULD BE THROUGH YOUR COMPANY'S ACCOUNTS AND NOT USING YOUR PERSONAL ACCOUNT. PLEASE DO NOT PROVIDE PERSONAL PAYMENT INFORMATION TO US. YOU MAY ONLY USE THE PAYMENT PORTAL AS SUPPORTED BY OUR THIRD PARTY PAYMENT PROCESSOR.**

**BY SUBMITTING YOUR PERSONAL INFORMATION THROUGH THE PAYMENT PORTAL, YOU EXPRESSLY CONSENT TO THE SHARING OF SUCH INFORMATION WITH OUR THIRD-PARTY PAYMENT PROCESSOR AND ACKNOWLEDGE THAT SUCH THIRD PARTY MAY STORE YOUR PERSONAL INFORMATION FOR THESE PURPOSES. TO THE FULLEST EXTENT PERMITTED BY LAW, DTW DISCLAIMS RESPONSIBILITY FOR THE THIRD-PARTY CREDIT CARD PROCESSOR'S FAILURE TO COMPLY WITH SUCH STANDARDS.**

**dtw assumes no liability for such third party providers' storage and use of your payment and other information.**

## *Business Transfer*

dtw may transfer your Personal Information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information about Site users is among the assets transferred (a "**Business Transfer**").

**BE ADVISED THAT A BUSINESS TRANSFER DOES NOT CERTAIN JURISDICTIONS' OPT-OUT REQUIREMENTS REGARDING SALE OF PERSONAL INFORMATION.**

## Cookies and Tracking Technologies

As you navigate through and interact with the Site, we may use automatic data collection technologies to collect certain information about your Device, browsing actions, and patterns.

dtw, our service providers, payment processors, and affiliates may collect, by automated means, information from your browser and Device through cookies and other tracking technologies.

Cookies are small data files containing a unique identifier that are placed on your Device when you visit the Site. Cookies, web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs), and similar technologies enable operators of website/apps to recognize your Device and collect information (including Usage Data) from your Device when you interact with them. Use of cookies allows us to deliver content specific to your interests and to save your access credentials so you do not have to re-enter it each time you visit our Site.

Our service providers may collect this type of information over time and across third-party websites and mobile applications.

Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Site may not work properly.

For more information about cookies, including how to see what cookies have been set on your Device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). If you do not accept our cookies, you may experience some inconvenience in your use of the Site. For example, we may not be able to recognize your Device and you may need to log in every time you visit the Site.

## Controls for Do-Not-Track Features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“**DNT**”) feature or setting you can activate to signal your privacy preference not to have data about your online DNT browsing activities monitored and collected. At this time, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Policy.

## Use of Your Personal Information

We may use Personal Information for the following purposes:

- to grant you access to our Site
- to enable you to register and create an account with us
- to fulfill or meet the reason you provided the information. For example, if you share your first name, last name, company email address, and company phone number to ask a question about our products, we will use such information to respond to your inquiry;
- to provide, support, personalize, and further develop the Site and products;
- to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses;
- to help maintain the safety, security, and integrity of the Site, products, databases and other technology assets, and business;
- for testing, research, analysis, and product development, including to develop and improve the Site and products;
- to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- to prevent and detect fraud;
- to evaluate or conduct a Business Transfer;
- in any other way we may describe when you provide the information; and/or
- for any other purpose with your consent.

**PLEASE NOTE THAT IF YOU INTERACT WITH OUR BRAND ON SOCIAL MEDIA SITES, THOSE SITES MAY COLLECT YOUR INFORMATION. BEFORE YOU VISIT THOSE SOCIAL MEDIA SITES, PLEASE READ THEIR TERMS REGARDING THEIR DATA COLLECTION AND USE PRACTICES. ADDITIONALLY, CERTAIN MARKETING COOKIES ALLOW THIRD PARTIES TO COLLECT YOUR CONTACT INFORMATION.**

## Disclosure of Your Personal Information

dtw may disclose information, including but not limited to Personal Information, that we collect or that you provide as described in this Policy, by way of example, but not limitation:

- with service providers we use to support our business, who are authorized to use your information only in support of our business and the uses described in this Privacy Policy
- to an advisor, buyer, or other successor in preparation of or in the event of a Business Transfer
- with our corporate parent, subsidiaries, and affiliates, including joint venture partners or other companies that we control or that are under common control with us
- to external professional advisors as necessary to defend our legal interests
- to comply with any legal obligation, court order, law, or legal process, including to respond to any government or regulatory request
- to protect against legal liability
- to prevent or investigate possible wrongdoing in connection with the Site
- to enforce or apply the Website Terms of Use (<https://www.dtwresearch.com/home/>, <https://cdpromo.dtwresearch.com/>) and other agreements you may enter into with us pursuant to your use and interaction with the Site
- if we believe disclosure is necessary or appropriate to invoke or protect the rights, property, or safety of the dtw, our customers, or others
- to fulfill the purpose for which you provide it
- for any other purpose disclosed by us when you provide the information
- with your consent

Other than as set forth in this Policy, dtw does not share, rent, or sell any Personal Information that we collect from you; provided, however, that dtw may share or disclose Usage Data with service providers.

## Retention of Your Personal Information

Personal Information and other information that you provide to us may be gathered and stored in one or more of our corporate databases.

To the extent permitted by law, we retain your Personal Information only for as long as it is necessary for the purposes set out in this Policy.

By way of example but not limitation, we will retain and use your Personal Information and Usage Data to the extent necessary

- to fulfill our obligations in our Agreements with your company
- to satisfy the purpose(s) for which it has been collected
- to respond to your requests
- to complete our transactions with you
- to send to you promotions as you may request
- to prevent re-registration with our Site, in the event that your account has been suspended or terminated
- to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws)
- to prevent fraud and assist with investigations
- to resolve disputes
- to enforce our legal agreements and policies
- for recordkeeping or internal analysis purposes
- to strengthen the security or to improve the functionality of our Site
- to take all other actions permitted by law

After which, we shall take steps to delete or anonymize your information.

## De-Identified and Aggregated Information

As permitted by applicable law, dtw may use and disclose de-identified and aggregated Personal Information, without your consent. Service providers may track and analyze Usage Data and volume statistical information about Site visitors and customers and track and analyze anonymous usage and browsing patterns of users of our Site. This information is collected to help dtw developers maintain our Site and work with our service providers to better serve you.

## Security

**dtw uses reasonable safeguards intended to protect the security, integrity and privacy of Personal Information provided to dtw by you. Passwords are stored in an encrypted manner. We also endeavor to protect your Personal Information by requiring that all our personnel and employees who have access to or are associated with the processing of your Personal Information, respect your confidentiality, and access to Personal Information is limited to personnel with a “need to know.” Service providers and payment processors who process Personal Information on our behalf are required contractually to have in place appropriate security measures. In addition, we have reasonable security measures in place in our physical facilities to protect against the loss or misuse of Personal Information at our facilities that we have collected from you. However, you must carefully consider what information you share with us, as we cannot guarantee that we will be able to block all attempted attacks to the security of our Site.**

**ALTHOUGH dtw USES REASONABLE SECURITY PRECAUTIONS WITH RESPECT TO YOUR PERSONAL INFORMATION COLLECTED FROM AND STORED ON OUR SERVERS, dtw CANNOT GUARANTEE THAT ANY OF YOUR PERSONAL INFORMATION STORED ON OUR SERVERS WILL BE FREE FROM UNAUTHORIZED ACCESS. TO THE FULLEST EXTENT NOT PROHIBITED BY LAW, dtw DISCLAIMS AND SHALL HAVE NO LIABILITY FOR ANY LOSS OF, UNAUTHORIZED ACCESS OR DAMAGE TO, OR INTERCEPTION OF ANY OF YOUR PERSONAL INFORMATION BEING STORED ON OUR SERVERS, OR TRANSMITTED TO OR FROM OUR PORTAL WHEN YOU ACCESS OUR SITE, OUR PROPRIETARY PRODUCTS AND/OR DATABASE OR DOWNLOAD IMAGES THEREFROM.**

**REMEMBER: WE DO NOT ASK FOR, NOR DO WE WANT TO RECEIVE FROM YOU, PERSONAL INFORMATION REGARDING YOUR PERSONAL CONTACT INFORMATION. WE ASK THAT YOU LIMIT THE INFORMATION THAT YOU PROVIDE TO US TO THE CONTACT INFORMATION THROUGH YOUR COMPANY,**

**MEANING ONLY YOUR COMPANY EMAIL ADDRESS AND YOUR COMPANY PHONE NUMBER.**

***Limit Personal Information:*** We again remind you to interact with us only through company owned or issued Devices and only through company email accounts to minimize the Personal Information you share with us. Further, we do not need your sensitive Personal Information for any reason. Accordingly, please do not post or share any such information with us.

***Protect Access Credentials:*** Where we or your company have given you (or where you have chosen) access credentials, you and your company are responsible for keeping such access credentials confidential. **To the extent that you create a password in connection with access credentials, do not use that password for multiple accounts. If you or your company suspect that your access credentials may have been compromised, you are required to notify us immediately.**

***Verify Before Sending Funds:*** If you receive a communication with contrary or alternate payment instructions or terms that appear to be from dtw, please contact us via telephone and notify your dtw account point of contact (**not** using the contact information included in the communication with contrary or alternate payment instructions or terms) to verify such instructions are in fact from us.

## **Choices About How We Use Your Information**

If you do not wish to have your email address or contact information used by us to promote our own products or services, you can opt-out by clicking unsubscribe and adjusting your preferences. This opt-out does **not** apply to information provided by dtw as a result of our products or services, our Agreement with your company, payments, or other transactions.

**BE ADVISED WE DO NOT CURRENTLY ENGAGE IN PRACTICES TRIGGERING CERTAIN JURISDICTIONS' OPT-OUT REQUIREMENTS REGARDING SALE OF PERSONAL INFORMATION.**

## **Your Privacy Rights**

**dtw DOES NOT ENTER INTO ANY CONSUMER TRANSACTIONS. ANY PERSONAL INFORMATION WE COLLECT IS SOLELY IN RELATION TO BUSINESS TO BUSINESS TRANSACTIONS.**

At present, dtw is not directly subject to states' privacy laws to the limited extent such laws relate to commercial transactional data and/or employee data. If and when we become subject to such laws, this Privacy Policy and practices will be updated accordingly. Further, if your employer directs us to delete, correct or otherwise comply with your exercise of your rights with your privacy rights with your employer, we will cooperate with your employer to effect such requests, subject to our right to retain

information if needed in relation to ongoing transactions or disputes with your employer, or as required by law.

If you do not wish your employer to share with us your name and company points of contact, please direct your request to your employer.

## Contact us

If you have any questions regarding this Privacy Policy or our privacy practices, you may email us at [pim@dtwresearch.com](mailto:pim@dtwresearch.com) with "PRIVACY POLICY" in the subject line, or send us a letter addressed to:

dtw Research, Inc.  
4812 First Coast Highway  
Fernandina Beach, Florida  
32034