



Privacy Policy

<https://www.inteum.com/privacy-policy/>

Introduction

This privacy policy describes how Inteum Company and its subsidiaries collect, protect and make use of the personal information you give the company.

If you are asked to provide personal information, it will only be used in the ways described in this privacy policy. This policy is updated from time to time. The latest version is published on this page.

Note to Residents of the European Union: To comply with the requirements of the European General Data Protection Regulation (GDPR) for our European customers and users, this Privacy Policy outlines the legal basis on which we process your Personal Data and provides other information required by the GDPR.

“Personal Data” is information that can be used to identify you, directly or indirectly, alone or together with other information. This includes things such as your full name, email address, phone number and certain cookie and network identifiers.

For the purposes of applicable data protection laws, Inteum Company LLC and its subsidiaries are the controller of the Personal Data you provide to us (“Data Controller”). As a Data Controller, we process the Personal Data we maintain about you in accordance with this Privacy Policy. If you have any questions or concerns regarding the processing of your Personal Data, or if you have questions regarding this Privacy Policy, please contact us through support@inteum.com.

It may be necessary to change this Privacy Policy from time to time. We therefore reserve the right to modify this Privacy Policy in accordance with the applicable data protection laws.



This website privacy policy was last updated on: October 21, 2024

Data Privacy Framework (DPF) Compliance

In addition to the GDPR compliance described above, Inteum Company complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Inteum Company has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Inteum Company has also certified that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF.

If there is any conflict between the terms in this privacy policy and the DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Inquiries and Complaints

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Inteum Company commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the DPF should first contact Inteum Company at:

Inteum Company LLC

9720 NE 120th Place, Suite 101

Kirkland, WA 98034

Email: support@inteum.com



Cooperation with Authorities

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Inteum Company commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

Disclosures to Public Authorities

Inteum Company may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Investigatory and Enforcement Powers of the FTC

Inteum Company is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

Binding Arbitration

Under certain conditions, individuals may invoke binding arbitration for complaints regarding Inteum Company's compliance with the DPF Principles. Inteum Company is obligated to arbitrate claims and follow the terms set forth in Annex I of the DPF Principles, provided that the individual has invoked binding arbitration by delivering notice to Inteum Company and following the procedures and conditions outlined in Annex I.

Liability in Onward Transfers

Inteum Company remains liable for the onward transfer of personal data to third parties who



process personal data on our behalf, unless we can prove that we are not responsible for the event giving rise to the damage.

Data we collect

We gather and use certain information about individuals for company communications, to provide products and services, and to enable certain functions on this website, for example:

- When you register for an account on Inteum Central.
- When you connect with us through social media.
- When you request marketing or business proposal information from us
- When you enter into a business relationship with us.
- When you complete our Contact Us form.

We also collect information to better understand how visitors use this website, which helps us improve user experience.

We may collect the following information:

- Name and job title
- Contact information including email address
- Demographic information, such as postcode, preferences and interests
- Website usage data including your location and/or IP address
- Other information relevant to client enquiries
- Other information pertaining to special offers and surveys

In certain cases, separate consent is not required, for example for the performance of a contract or to meet legal obligations, but in any instance where we are collecting your Personal Data, we will provide a link to this Privacy Policy.

How we use the data



The data we collect helps us understand how visitors interact with Inteum, enabling us to better communicate our product and service offerings.

Specifically, we may use data for:

- Our internal records.
- Improving Inteum Company products and services.
- Contacting you in response to a specific inquiry.
- Customizing the website to improve your experience.
- Sending promotional communications about products, services, offers and/or other content we determine is relevant to you.
- Contacting you via email, phone, post or social media for market research purposes. How we use cookies

How we use cookies

What is a cookie?

A cookie is a small file placed on your computer's hard drive. It enables our website to identify your computer as you view different pages on our website.

Cookies allow websites and applications to store your browser preferences in order to present content, options or functions that are specific to you. They also enable us to see information like how many people use the website and what pages they tend to visit.

We may use cookies to:

- Analyze our web traffic using an analytics package. Aggregated usage data helps us improve the website structure, design, content and functions.
- Identify whether you are signed in to our website. A cookie allows us to check whether you are signed in to the site.
- Test content on our website. For example, 50% of our users might see one piece of content,



the other 50% a different piece of content.

- Store information about your preferences. The website can then present you with information you will find more relevant and interesting.
- To recognize when you return to our website. We may show your relevant content or provide functionality you used previously.

Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us.

Controlling cookies

You can use your web browser's cookie settings to determine how our website uses cookies. If you do not want our website to store cookies on your computer or device, you should set your web browser to refuse cookies. However, please note that doing this may affect how our website functions. Some pages and services may become unavailable to you. Unless you have changed your browser to refuse cookies, our website will issue cookies when you visit it. To learn more about cookies and how they are used, visit [All About Cookies](#).

Your information

When you fill in a form or provide your details on our website, you may see one or more tick boxes allowing you to:

- Opt-in to receive marketing communications from us by email, telephone, text message or post.
- Opt-in to receive marketing communications from our third-party partners by email, telephone, text message or post.

If you have agreed that we can use your information for marketing purposes, you can change your mind easily via one of these methods:

- Unsubscribe via the unsubscribe link in our email communications.



- Send an email to support@inteum.com
- Write to us at: 9720 NE 120th Place, Suite 101, Kirkland, WA 98034

We will never lease, distribute or sell your personal information to third parties unless we have your express permission, or the law requires us to.

Exercising your rights under GDPR

Inteum Company and its subsidiaries take steps to keep your Personal Data accurate and up to date. If you reside in the European Union, you have certain rights to the Personal Data that we have collected about you. To exercise your rights to your Personal Data, please contact us through support@inteum.com. We will respond to requests as soon as practicable, and in any event, within the time limits prescribed by law.

You have the following rights:

Right of access to your Personal Data (Art. 15 GDPR): You have the right to ask us for confirmation on whether we are processing your Personal Data, and access to the Personal Data and related information on that processing (e.g., the purposes of the processing, or the categories of Personal Data involved).

Right to correction (Art. 16 GDPR): You have the right to have your Personal Data corrected, as permitted by law.

Right to erasure (Art. 17 GDPR): You have the right to ask us to delete your Personal Data, as permitted by law. This right may be exercised among other things: (i) when your Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed; (ii) when you withdraw consent on which processing is based according to Art. 6 (1) (a) or Art. 9 (2) (a) GDPR and where there is no other legal ground for processing; (iii) when you object to processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or when you object to the processing pursuant to Art. 21 (2) GDPR; or, (iv) when your Personal Data has been unlawfully processed.



Right to restriction of processing (Art. 18 GDPR): You have the right to request the limiting of our processing under limited circumstances, including: when the accuracy of your Personal Data is contested; when the processing is unlawful and you oppose the erasure of your Personal Data and request the restriction of the use of your Personal Data instead; or when you have objected to processing pursuant to Art. 21 (1) GDPR pending the verification whether the legitimate grounds of Inteum Company and its subsidiaries override your grounds.

Right to data portability (Art. 20 GDPR): You have the right to receive the Personal Data that you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that information to another controller, including to have it transmitted directly, where technically feasible.

Right to object (Art. 21 GDPR): You have the right to object to our processing of your Personal Data, as permitted by law. This right is limited to processing based on Art. 6 (1) (e) or (f) GDPR, and includes profiling based on those provisions, and processing for direct marketing purposes. After which, we will no longer process your Personal Data.

Data Retention

We will retain your Personal Data for as long as you maintain an account or as otherwise necessary to provide you our products and services. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Where we no longer need to process your Personal Data, we will delete your Personal Data from our systems.

Security

We implement appropriate technical and organizational safeguards to protect against unauthorized or unlawful processing of Personal Data and against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and



transmission of Personal Data.

If you consider that the security or privacy of the Personal Data we hold on you has been breached, you should notify us immediately through support@inteum.com.

We will log the breach and invoke our breach notification process to communicate with the relevant bodies.

Links from our site

Our website may contain links to other websites.

Please note that we have no control of websites outside the Inteum.com domain. If you provide information to a website to which we link, we are not responsible for its protection and privacy.

Always be wary when submitting data to websites. Read the site's data protection and privacy policies fully.



Revision History

Date of Change	Responsible	Version	Summary of Change
1/22/19	Preet Mood	1.1	No changes are needed.
11/14/19	Preet Mood	1.2	Reviewed document and No changes are needed
1/12/2021	Preet Mood	1.3	Reviewed document and No changes are needed
1/4/2022	Preet Mood	1.4	Reviewed document and No changes are needed
1/23/2023	Preet Mood	1.5	Reviewed document and No changes are needed
1/16/2024	Preet Mood	1.6	Reviewed document and no changes are needed
1/23/2025	Yavuz Alparslan	1.6	Reviewed document. No updates.
1/22/2026	Yavuz Alparslan	1.6	Reviewed document. No updates.