

Cookie & Device Policy

This Cookie & Device Policy describes how your browser and device information is collected, used, and shared when you visit www.s2cp.com (the “Site”).

PERSONAL INFORMATION WE COLLECT

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as “Device Information.”

We collect Device Information using the following technologies:

- “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the Site.

When we talk about “Personal Information” in this Cookie & Device Policy, we are talking about Device Information.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our visitors browse and interact with the Site).

We share your Personal Information with third parties to help us use your Personal Information, as described above. For example, we use Google Analytics to help us understand how our customers use the Site--you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

DO NOT TRACK

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

LEGAL BASIS FOR PROCESSING OF PERSONAL INFORMATION UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)

If you are from the European Economic Area (EEA) or the UK, our legal basis for collecting and using the Personal Information described in this Privacy Notice depends on the Personal Information we collect and the specific context in which we collect it.

We may process your Personal Information because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- For payment processing purposes
- To comply with the law

Generally, we do not rely on consent as a legal basis for processing your Personal Information although we will get your consent before sending third party direct marketing communications to you via email or text message or before collecting special categories of personal data. You have the right to withdraw consent to marketing at any time by contacting us.

Purpose for which we will use your Personal Information: We have set out below, in a table format, a description of all the ways we plan to use your Personal Information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Information where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new user on the S2 website	Identifying data; contact information	Performance of a contract with you

<p>To process and complete your service request</p>	<p>Identifying data; contact information; financial information; transactional correspondence; marketing correspondence</p>	<ol style="list-style-type: none"> 1. Performance of a contract with you; 2. Necessary for our legitimate interests (to recover debts due to us; direct marketing)
<p>To manage our relationship with you, including: (a) notifying you about changes to our terms or Privacy Notice, (b) asking you to leave a review</p>	<p>Identifying data; contact information; marketing correspondence</p>	<ol style="list-style-type: none"> 1. Performance of a contract with you; 2. Necessary for our legitimate interests (to keep our records updated; direct marketing); 3. Necessary to comply with a legal obligation
<p>To administer and protect our business and the Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Identifying data; contact information; usage data; aggregate data</p>	<ol style="list-style-type: none"> 1. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise); 2. Necessary to comply with a legal obligation

<p>To deliver relevant Site content to you and measure or understand the effectiveness of the content we serve to you</p>	<p>Identifying data; contact information; marketing correspondence; usage data; transactional correspondence; aggregate data</p>	<p>Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, research, marketing, client and Supporter relationships and experiences</p>	<p>Usage data; aggregate data</p>	<p>Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>Identifying data; contact information; marketing correspondence; usage data; transactional correspondence; aggregate data</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
<p>To ask you to participate in a survey, record survey responses, and use your responses to guide S2 programming and/or create S2 research and publications</p>	<p>Identifying data; contact information; marketing correspondence; survey responses; aggregate data; special categories of data such as race and ethnicity (with prior consent)</p>	<p>Necessary for our legitimate interests (to develop our products/services/research, inform our programming strategy, and grow our business)</p> <p>Consent (for special categories of data)</p>

To conduct research focus groups and interviews and identify possible initiatives	Usage data; aggregate data	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy, to help S2 create more inclusive workplaces for its employees)
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We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

TRANSFER OF INFORMATION

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. As we operate globally, we may collect Personal Information outside the United States and transfer it from other countries to the United States, either for use within S2 or for use of third parties providing services to us. If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Information, to the United States or other countries and process it there and these countries may not have as strict of privacy laws as your jurisdiction and may not have an adequacy decision or appropriate safeguards as defined in your jurisdiction. You should consider the risks of such transfer before using the Site. S2 may transfer your data to third parties as set forth herein, but shall maintain responsibility for such data in cases of onward transfer to third parties as required under applicable law. By using the Site, you hereby knowingly and expressly consent to the collection, storage, transfer, and usage of your Personal Information in and to the United States of America and to other countries for the uses described in this Privacy Policy.

We will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice and not transfer your Personal Information to an organization or a country unless there are adequate controls in place including the security of

your data and other Personal Information (which may include Privacy Shield certification, an EU adequacy decision, or standard contractual clauses, approved by the European Commission) or we have your consent.

DATA RETENTION

When you visit the Site, we will maintain your Device Information for our records unless and until you ask us to delete this information.

CHANGES

We may update this Cookie & Device Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

CONTACT US

For more information about our Cookie & Device practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at info@s2cp.com.