

COGNA PRIVACY POLICY

Last updated: November 30th, 2023

Welcome to Cogna's privacy policy.

We are Cogna Ltd ("**Cogna**", "**we**" or "**us**"). Our company registration number is 14854153 and our registered address is at 80 Cheapside, London, England, EC2V 6EE.

For the purposes of UK laws regarding data protection, the data controller is Cogna and we are registered with the UK Information Commissioner's Office (ICO): ZB632661.

This privacy policy applies to individuals who visit our website at <https://cogna.co/> or <https://cogna.app/> subdomains (the "**Website**") or social media accounts and in connection with any customer engagements or matters. It also applies to all our business contacts, including contractors, suppliers, employees and agents (including when you apply to work for us, whether as an employee, consultant or contractor). It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

Cogna – Privacy Statement

At Cogna, the privacy of individuals is important to us. We believe in a responsible and pro-active approach when dealing with their personal information.

This policy sets out how and why we collect, store, use and share personal information generally, our dedication to protect it, as well as your rights in relation to your personal information and details of how to contact us and supervisory authorities if you have a complaint.

If you have any questions about how we use your personal data, please contact: support@cogna.co

1. The types of personal data we collect

We collect and use the following information about you:

- ❖ **Your Identity Data** including your first name, surname and, if applicable, national insurance number and photos of your passport and a recent utility bill.
- ❖ **Your Contact Data** including your billing address, postal address email address, and telephone numbers.
- ❖ **Financial Data** including bank account and payment card details.
- ❖ **Your Transactional Data** including information about our business dealings, transactions and interactions with you.
- ❖ **Your Technical Data** including general metadata and your IP address when you visit or engage with our Website or social media accounts.
- ❖ **Usage Data** including information about how you use our Website and services including any user preferences.
- ❖ **Marketing and Communications Data** including your preferences in receiving marketing from us and your communication preferences.
- ❖ **Survey Data** including data from surveys that we may, from time to time, run on the Website for research purposes, if you choose to respond to, or participate in, them.
- ❖ **Application Data** including information within your resume/CV or provided by recruitment agencies, information held on your social media accounts such as LinkedIn and any other information that is shared with us throughout the application process.

- ❖ **Recruitment Data** including data relating to your performance during the application process and information provided by third party references, criminal records check (if applicable) and any relevant recruitment test results (if applicable).
- ❖ **Equal Opportunities Data** including your ethnicity, gender, socio-economic background, sexual orientation, religion, any disabilities that you may have and/or any equal opportunities monitoring information that you may provide.
- ❖ **Business Data** including business contact details, third party references (if required), information required for anti-money laundering checks (if applicable), and insurance documents.
- ❖ Other information we receive such as where you register to receive our newsletters or to attend an event or to submit an enquiry via our Website.

We will indicate where any personal information we have requested is mandatory. We will also explain the consequences should you decide not to provide information which we have indicated is mandatory. In some circumstances this may mean we are unable to provide you with a certain service.

2. If you fail to provide personal data

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

3. How we use personal data

We use personal data relating to you that we collect, or that you provide to us, for the following purposes:

- to respond to your queries;
- to fulfil the terms of our engagement with our customers;
- to ensure legal and regulatory compliance;
- to handle any complaints and disputes;
- to perform our day-to-day business operations including business development;
- for processing your application to work for us (including to onboard employees), improving the application process, and for pre-employment checks;
- for financial management;
- to ensure that content from the Website is presented in the most effective manner for you and for your computer;
- to notify you about changes to the Website and the materials on the Website;
- as part of our efforts to keep the Website safe and secure; and
- to provide you with marketing information related to our services which we believe may be of interest to you.

4. Lawful basis for processing

We will only process your personal data where we have a lawful basis to do so. The lawful basis will depend on the purposes for which we have collected and use your personal information. In almost every case, the lawful basis will be one of the following:

- ❖ **Our legitimate business interests** Where we have a legitimate interest to use personal data regarding you in relation to the operation of our business. Also, where it is necessary for system administration purposes and for internal operations, including survey purposes.
- ❖ **Performance of an agreement with you (or in order to take steps prior to entering into an agreement with you):** For example:
 - where you have provided your information in order to receive details in relation to our services from us; or
 - where you have purchased services on the Website and we need to use personal data regarding you to fulfil our contract with you.
- ❖ **Compliance with the law:** where we are subject to a legal obligation and need to use your personal information in order to comply with that obligation.

5. How we share your personal data with third-parties

We may share your personal information with our suppliers and business partners where they are helping us to market, advertise or supply our services, for them to use for the purposes set out in this privacy policy. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We may disclose your personal information to other third parties in the following cases:

- for the purposes of research, evaluation, and analysis of our services;
- in the event that we sell any business or assets, in which case we may disclose your personal information to the prospective buyer of such business or assets;
- if we or substantially all of our assets are acquired by a third party, in which case personal information held by us about our clients, contractors, suppliers and visitors to our Website will be one of the transferred assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation or request; or
- to protect the rights, property or safety of us or our users, or others, and in order to enforce or apply our terms and conditions (this includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Marketing

We may send you marketing materials which we believe may be of interest to you.

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You may receive marketing communications from us if you have requested information from us or purchased goods on the Website and you have not opted out of receiving that marketing.

Third-party marketing. We are committed to protecting and respecting your personal data. We will not sell or rent your personal data to any third parties. We will not share your personal data with third parties for marketing purposes.

Opting out. You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time. Where you opt out of receiving these marketing

messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

7. Cookies

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. We use the following cookies:

- ❖ **Strictly necessary cookies.** These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website or make use of e-billing services.
- ❖ **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
- ❖ **Functionality cookies.** These are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences.
- ❖ **Targeting cookies.** These cookies record your visit to our Website, the pages you have visited and the links you have followed.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Title	Purpose
CCState	We use Microsoft Entra for authenticating users. This cookie contains session information state to be used between Microsoft Entra ID and the Microsoft Entra Backup Authentication Service.
buid	We use Microsoft Entra for authenticating users. This cookie tracks browser related information. Used for service telemetry and protection mechanisms.
ESTSAUTH	We use Microsoft Entra for authenticating users. This cookie contains user's session information to facilitate SSO. Transient.
ESTSAUTHPERSISTENT	We use Microsoft Entra for authenticating users. This cookie contains user's session information to facilitate SSO. Persistent.
ai_session	These cookies are used by Microsoft Azure Application Insights, which collects site telemetry, allowing us to analyze how our site is performing and to perform optimization.
MicrosoftApplicationsTelemetryDeviceId	We use Microsoft Entra for authenticating users. This cookie tracks a unique ID for the users' device for telemetry purposes.
esctx (including any cookie with name esctx-*)	We use Microsoft Entra for authenticating users. This cookie provides session context cookie information. For CSRF protection. Binds

	a request to a specific browser instance so the request can't be replayed outside the browser. No user information.
ESTSAUTHLIGHT	We use Microsoft Entra for authenticating users. This cookie contains Session GUID Information. Lite session state cookie used exclusively by client-side JavaScript in order to facilitate OIDC sign-out. Security feature.
brcap	We use Microsoft Entra for authenticating users. This is a client-side cookie (set by JavaScript) to validate client/web browser's touch capabilities.
x-ms-gateway-slice	We use Microsoft Entra for authenticating users. This cookie is a Microsoft Entra Gateway cookie used for tracking and load balance purposes.
fpc	We use Microsoft Entra for authenticating users. This cookie tracks browser related information. Used for tracking requests and throttling.
_dd_s	We use Datadog Real User Monitoring for analytics and support purposes. This cookie is used to group all events generated from a unique user session across multiple pages. It contains the current session ID, whether the session is excluded due to sampling, and the expiration date of the session. The cookie is extended for an extra 15 minutes every time the user interacts with the website, up to the maximum user session duration (4 hours).
SignInStateCookie	We use Microsoft Entra for authenticating users. This cookie contains list of services accessed to facilitate sign-out. No user information. Security feature.
intercom-id-l33mpy9e	We use Intercom for chat support. This cookie allows visitors to see any conversations they've had on Intercom websites.
stsservicecookie	We use Microsoft Entra for authenticating users. This cookie is a Microsoft Entra Gateway cookie also used for tracking purposes.
_upscope__shortId	We use Upscope to enable co-browsing from inside Intercom chats to allow us to help customers navigate our applications. This cookie is necessary for Upscope's functionality.
intercom-device-id-l33mpy9e	We use Intercom for chat support. This cookie is used to identify the device interacting with the Intercom Messenger in order to improve security.

intercom-session-l33mpy9e	We use Intercom for chat support. This cookie allows users to access their conversations and have data communicated on logged out pages for 1 week.
_upscope__region	We use Upscope to enable co-browsing from inside Intercom chats to allow us to help customers navigate our applications. This cookie is necessary for Upscope's functionality.
session	Used to to identify the users session on the server to allow the application to store user-specific state and use this in serving the application. Necessary for the application to work correctly.
oidc_id_token	We use Microsoft Entra for authenticating users. This cookie is used to facilitate SSO through Microsoft Entra.

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.

We do not share the information collected by the cookies with any third parties.

8. Where we store your personal data

Generally, the personal data that we collect from you will not be transferred to, and stored within, countries outside the United Kingdom ("UK") and European Economic Area ("EEA").

However, if we do transfer your information internationally, we will take steps which are reasonably necessary to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely and in accordance with this privacy policy. In these cases, we rely on approved data transfer mechanisms (such as the EU "Standard Contractual Clauses" or UK "International Data Transfer Agreement" or "UK Addendum") to ensure your information is subject to adequate safeguards in the recipient country. If you are located in the UK or EEA, you may contact us for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances.

9. Your Rights

Cogna takes your privacy seriously and wants you to be aware of your rights, as follows:

- you have the right to request (i) confirmation of whether we process your personal data and (ii) access to a copy of the personal data retained;
- you have the right to have inaccurate personal data rectified, or completed if it is incomplete;
- in certain situations, you have the right to have your personal data erased or transmitted directly to another company, where technically feasible;
- where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time without impact to any data processing activities that have taken place before such withdrawal;

- you have the right not to be subject to any decisions based solely on automated processing, including profiling, which has legal or other similarly significant effects on you unless we have your consent, it is authorised by law or it is necessary for the performance of an agreement;
- in certain situations, you have the right to restrict or object to our processing of personal data regarding you; and
- the right to lodge complaints before the UK Information Commissioner's Office and you may do so at <https://ico.org.uk/make-a-complaint/>.

Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details. This is a security measure to ensure that personal data 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.

Please send us an email at support@cogna.co if you would like to exercise any of your rights.

10. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We take steps to ensure that your information is treated securely and in accordance with this policy. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, for example, by encryption or by using pseudonymisation, we cannot guarantee the security of your information transmitted via the internet; any transmission is at your own risk.

We have appropriate technical and organisational measures in place to ensure a level of security appropriate to the risk to personal data. We maintain these technical and organisational measures and will amend them from time to time to improve the overall security of our systems.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We will, from time to time, include links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to these websites.

11. How long we keep your personal data

We retain your information for as long as it is necessary for the purposes for which it was collected and processed. Additionally, we retain data for the purposes of satisfying any legal, regulatory, accounting, finance, tax, reporting and insurance requirements after which we take steps to destroy or de-identify personal data when the information is no longer required for any purpose for which it may be used or disclosed by us and we are no longer required by law or regulation to retain the information. Please note that this will be assessed on a case by case basis.

After our agreement with you expires or terminates, or our relationship with you has otherwise ended, we may store your information in an aggregated and anonymised format.

12. Information relating to children

The services provided by Cognia are not directed at persons under the age of 18. If you believe that we have personal data about or collected from a child under the relevant age, please contact us at support@cogna.co

9. Complaints

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at support@cogna.co and we will endeavour to deal with your request as soon as possible.

This is without prejudice to your right to launch a claim with the relevant data protection authority.

10. Changes

It is your responsibility to check this policy regularly for any changes. We will also update the "Last Updated" date at the top of this policy, which reflects the effective date of such policy. Your continued engagement with us after the date of the updated policy constitutes your acceptance of the updated policy. If you do not agree to the updated policy, you must stop your engagement with us.