

Crayon Legacy Privacy Policy

Global Privacy Policy of Crayon

This document was created to host the Crayon Privacy policy in the event crayon.com website is decommissioned.

Document title:
Policy owner:

Crayon website privacy policy
Marketing

02.07.2026

Please follow the link to the relevant section

[Privacy policy for Customers](#)

[Privacy policy for Partners & Suppliers](#)

[Privacy policy for individuals](#)

FOR CUSTOMERS

Crayon's Secured Productivity commitments towards our Customers Secured Productivity Policy

Crayon's Secured Productivity Policy for team members is a critical component within Crayon's integrity, compliance, security and privacy architecture. This policy applies to all Crayon team members, which means Crayon's board of directors and all employees, consultants, contractors, sub-contractors, directors, executive officers, and affiliates in which Crayon owns more than 50% of the voting controls. Every team member is held accountable for any neglect of their duty to safeguard our integrity or protect the data they are entrusted to process, in accordance with Crayon's global rules to secure its business operations, data processing and business ecosystem.

[Secured Productivity Policy 2024](#)

1.1.1.1 Secured Products & Services

Download our Secured Product Briefings:

[Optima-iQ](#) [Cloud-iQ](#)

Download our Secured Service Briefings:

[Software License Procurement](#)

1.1.1.2 Business Integrity

How we champion human rights and practice responsible sourcing to earn our customer's trust.

1.1.1.2.1 CERTIFICATIONS

Crayon has held global ISO 37001 certification for its digital transformation services and support functions since 2023.

[Our Global ISO 37001 Certificate](#)

1.1.1.2.2 BUSINESS INTEGRITY ORGANIZATION

The Compliance and Integrity (COIN) team consists of dedicated Integrity Investigations and Commercial Compliance Specialists, and reports directly to our Chief Security Officer.

1.1.1.2.3 HUMAN RIGHTS

The fundamental principles of individual dignity and the protection of human rights serve as the foundation for the conduct we expect from every Crayon team member and employee within our supply chain.

At Crayon, fostering a work environment that promotes respect for everyone we work with is of utmost importance to us. We are committed to upholding internationally recognized human rights across all aspects of our operations, and we expect the same level of commitment from our partners and suppliers.

We take great pride in aligning with the United Nations Guiding Principles on Business and Human Rights, integrating responsible business conduct into our policies and management systems. Our dedication extends to adhering to the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises, the International Bill of Human Rights, and the core conventions of the International Labor Organization.

Furthermore, we promise to protect our employees' right to collective bargaining and freedom of association, while actively working towards eliminating forced labour, child labour, and employment discrimination.

We kindly invite you to read Crayon's 2024 ESG Report for more information on our commitment and action in championing human rights, health and safety, and diversity, equity and inclusion:

[Our ESG Report](#)

1.1.1.2.4 RESPONSIBLE SOURCING

Crayon's 2024 ESG report documents our leadership commitment and the concerted efforts of our team members in practicing responsible sourcing and promoting human rights and decent working conditions. It highlights the accomplishments already achieved, sets forth our targets, and elaborates on our strategies to attain them successfully.

The Norwegian Transparency Act (NTA) took effect on July 1, 2022, with the aim of advancing the protection of fundamental human rights and promoting decent working conditions.

In honoring Crayon's own commitment to the NTA, we have produced a dedicated Human Rights Transparency Statement for the 2024 reporting period that states our short- and long-term targets and provides an update on the milestones Crayon has reached in responsible sourcing over the past 18 months.

[Our NTA & Modern Slavery Statement](#)

1.1.1.3 Information Security

How we protect the data we are entrusted to process by our customers with state-of-the-art technical and organizational measures.

CERTIFICATIONS

- Global ISO 27001:2017 certification since 2021.
- British CyberEssentials Plus since 2022.
- Singapore CyberEssentials since 2024.
- German TISAX since 2022.

[Crayon's Global ISO 27001 Certificate](#)

INFORMATION SECURITY ORGANIZATION

Crayon's Chief Information Security Officer, Daniel Baker, in his role as Head of Information Security and Data Protection (ISDP) reports directly to our Chief Security Officer and is responsible for the management of the ISDP Team and effective delivery of the team's responsibilities.

The ISDP team consists of Security Analysts and Security Engineers with a wide range of specialist skills that include Cloud Security, Incident Response,

Penetration Testing, Threat Hunting and SIEM/SOAR Engineering. This team collaborates closely with the Data Privacy Advisors as part of delivering on our Security and Privacy by Design and Default approach.

To ensure our organizational independence in the handling of a potential data breach, our CISO is entrusted with the authority afforded to a Data Protection Officer under Article 38 of the European Union General Data Protection Regulation.

DATA CLASSIFICATION

Our data classification rules dictate that access to data processed by Crayon must be controlled based on whether it is: a) Confidential or Highly Confidential to a defined set of authorized individuals; b) Internal to Crayon; c) Public; or, d) Private to one of our team members.

VULNERABILITY SCANNING

We use dedicated tools to regularly perform scans across Crayon's public facing infrastructure, and our internal network. Ad-hoc scans are also performed to identify specific threats (e.g., Log4J).

PENETRATION TESTING

We regularly perform penetration tests against our customer facing applications and overall IT infrastructure. Crayon's Information Security and Data Protection team has internal resources that are highly skilled and experienced in performing penetration testing activities.

INCIDENT MANAGEMENT

We follow a seven step Incident Response Plan that defines how to recognise and report a suspected data breach, assess its severity and impact, perform a containment, notify impacted parties, and resolve a data breach. As each type of security event requires a tailored approach, Crayon's CISO and DPO first assembles the required specialists from Crayon's Information Security and Data Protection team and the affected team members from across the business to ensure impact assessments and mitigating actions are also concluded in due time to meet our 72-hour notification obligation towards relevant Supervisory Authorities under the

European Union General Data Protection Regulation (no incidents of this nature to date).

[Open our Incident Response Plan](#)

1.1.1.4 Data Protection

How we champion data protection across our global organization to earn our customer's trust.

1.1.1.4.1 CERTIFICATIONS

Crayon has held global ISO 27701 certification for its digital transformation services and support functions since 2021.

[Crayon's Global ISO 27701 Certificate](#)

1.1.1.4.2 About Crayon

Crayon is a global IT advisory firm in software and digital transformation services committed to maintaining levels of protection of personal data aligned to best practices in the industry which, as a minimum, comply with the requirements of the Applicable Data Protection Legislation and Crayon's legal requirements.

Being transparent about the data we process, we have issued this Data Privacy Notice to inform you about how and why we collect and process your personal data, our privacy practices and your rights as data subjects with respect to the processing of your personal data.

This Privacy Notice sets out the general standard that Crayon has implemented when processing personal data. This Privacy Notice applies when Crayon acts as a Data Controller or as a Data Processor. It applies to the processing of all personal data, irrespective of the nature or category of the personal data, regardless of the media on which that data is stored. Nevertheless, certain services may contain particular conditions

of use with provisions on the protection of personal data, which prevail over this Privacy Notice.

1.1.1.4.3 When Crayon is the Data Controller

Crayon Group Holding ASA is the controller for the personal data we process, unless otherwise stated.

Data Protection Officer Alyssa DE LEON

Email Address DPO@Crayon.com

Postal Address Gullhaug Torg 5 0484, OSLO, Norway

Enable customer administration

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you liaise with us on behalf of our customers or contacts (including prospective customers) or may come from the relevant customer or contact, your employer, other customers, suppliers and other business partners.
- We handle your personal data in alignment with our legitimate interest in conducting our business operations. This includes negotiating and finalizing agreements with your organization. Our administration of these agreements involves providing pricing information, delivering products or services and fostering a productive relationship. Additionally, we generate invoices and maintain a comprehensive CRM database, which may include pertinent organizational charts
- We retain your personal data for as long as is necessary to fulfill the purpose for which it was collected.

Enable marketing and sales communications

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role. We collect your personal data directly from you when you interact or engage with us, such as when you subscribe to our marketing

communications, sign up to our products or services, attend an event or when you have expressed an interest in our services based on the web content you consume.

- We handle your personal data in alignment with our legitimate interest in operating our business. This includes conducting promotional activities, such as sending you targeted marketing information to promote our products and services.
- We retain your personal data for as long as is necessary to fulfill the purpose for which it was collected.

Opt-out

If you no longer wish to receive marketing communications from us, you can unsubscribe by clicking the unsubscribe link in our email communications. Alternatively, you can send us a brief email to:

Opt-Out@Crayon.com

Data Retention

We keep your personal information for no longer than necessary for the purposes for which it is processed. The length of time for which we retain personal information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws as set out in our data retention policy and information handling standards. Generally, this means we retain your personal data to comply with any retention compliance obligations or statutory requirements or for purposes of performing a contract with you. Where there are technical limitations that prevent deletion or anonymization, we safeguard personal information and limit active use of it through implementing appropriate organizational technical and security measures.

Data Sharing

Subject to applicable law, including to the extent applicable law requires us to obtain consent, we may disclose personal information as follows:

- **Crayon Group Entities:** We may disclose your personal data to other entities under common ownership or control with Crayon. These entities use your personal data as described in this Policy. Further information regarding the Crayon Group companies can be obtained [here](#).
- **Service Providers and Advisors:** We may use third party vendors and other service providers to perform services on our behalf. Such services may include marketing campaign services, providing mailing or email services, tax and accounting services, payment processing, conducting surveys, performing customer service, performing data enhancement services, performing fraud prevention services, performing web hosting services or providing analytic services. Any service providers will be provided appropriate data

processing agreements be bound to only process the data on Crayon's behalf and under its instructions, unless such service providers act as their own controllers (e.g., in the case we seek advice from lawyers and tax consultants).

- **Marketing Partners:** We may provide your personal information to sponsors of events, webinars, or games for which you register, or other parties with whom we may engage in joint marketing activities.
- **Partners:** We may provide your personal data to our partners who supply cloud services to you for the purposes of facilitating licence transactions or services on your behalf where applicable.
- **Purchasers and third parties in connection with a business transaction:** Third parties in connection with a Crayon-related transaction, such as a merger, sale of Crayon assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business, or in the event of a bankruptcy or similar proceedings.
- **Law enforcement, regulators, and other parties for legal reasons:** Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our legal claims or to protect the security or integrity of our Services; and/or (c) to exercise or protect the rights, property or personal safety of Crayon team members, our visitors or others.

Crayon is a truly global organisation so your personal data may be transferred for any of the above stated purposes to different global locations. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

If it is necessary to transfer your personal data from your habitual place of residence to countries that do not offer adequate protections, then we will ensure that appropriate safeguards as required by applicable laws are put in place prior to the transfer of the data. For example by incorporating standard contractual clauses (more information about such clauses is available [here](#)) into contract(s) / data transfer agreement(s) established between the parties transferring the personal data

We may transfer or share your personal data with third parties such as our service providers and vendors, business partners, professional and corporate advisors, public or government authorities including law enforcement, network providers, third party websites, and our affiliates or subsidiaries.

In the event of a merger, reorganization, dissolution or other fundamental corporate change, we may need to disclose your information to a third party in accordance with applicable laws.

Compliance by any third party engaged by Crayon

In the event that any third-party processes personal data on behalf of Crayon, such third party shall:

- Comply with this Policy and Crayon's security policies and standards in addition to any other security controls included within contractual agreements between Crayon and its clients and/or partners.
- Process personal data in accordance with Crayon's documented instructions and for no other purpose than the one expressly defined in writing by Crayon, unless it is required to do so under any mandatory law. In such case, the third party shall inform immediately Crayon of this legal obligation prior to processing.
- Implement and maintain appropriate technical, organizational and contractual measures to ensure appropriate level of protection of personal data and to prevent any unauthorized or unlawful processing of personal data and any accidental loss, destruction or damage to personal data. These measures shall (i) consider the highest standards and the risks posed by the Processing activities, (ii) be designed to implement the data protection principles in an effective manner and provide the processing activities with the necessary safeguards in order to meet the requirements of the Applicable Data Protection Legislation.
- Notify, to the extent permitted by law, Crayon of any request for disclosure of Crayon's personal data that it receives from a third party, public authority or court, as well as of any action and/or measure regarding the processing of Crayon's personal data that is under investigation by the authorities.
- Comply with any request from Crayon for access, rectification, blocking, restoration, deletion and objection of Crayon's personal data and ensure portability and the right to be forgotten of Crayon's personal data.
- Notify Crayon immediately of any changes that may affect the processing of Crayon's personal data.
- Actively cooperate with Crayon to assess and document the compliance of Crayon's personal data processing, including providing Crayon with any information that Crayon may need or require to comply with Applicable Data Protection Legislation (including any information required for the Transfer Impact Assessment (TIA)).
- Immediately inform Crayon in writing if, in its opinion, any instruction from Crayon regarding the Processing of Crayon's personal data constitutes a violation of the Applicable Data Protection Legislation.

Your Choices

This section describes many of the actions you can take to change or limit the collection, use, storage, or other processing of your personal information.

- **Marketing Messages:** You can opt out of email marketing messages we send you by clicking on the "unsubscribe" link in the email message. Alternatively, you can send us a brief email to: Opt-Out@Crayon.com if you have engaged in transactions with us, we may

continue to send transactional or relationship messages (e.g., signing notifications or account notifications) after you opt out of marketing messages. If you would like your phone number added to our internal Do-Not-Call list to opt out of telemarketing messages, let us know at any time, including during a telemarketing call, that you do not want to be called again for telemarketing purposes.

- **Cookies and Other Related Technology.** You can decline cookies through your browser settings or via the Crayon Cookie Preference Center. However, if you decline cookies, you may not be able to use some parts of our Services. Please note we do not recognize or respond to browser initiated Do Not Track signals.
- **Device and Usage Information.** If you do not want us to see your device location, you can turn off location sharing on your device, change your device privacy settings, or decline to share location on your browser.

Data Subject Rights

The rights available to you depend on our reason for processing your personal data:

- **Right to Information:** obtain information about the personal data processing by us, in addition to that information already provided by us through its privacy policy.
- **Right of Access:** get confirmation whether we are processing your personal data and, if so, get a description and copy of that data.
- **Right to Rectification:** get a rectification of any inaccuracies of your personal data which we are processing.
- **Right to Erasure, to Restrict and to Object:** ask us to erase or stop or restrict the processing of your personal data.
- **Right to Data Portability:** obtain a copy of your personal data transmitted by us to another data controller in a structured, commonly used, and machine-readable format.

Where Crayon acts as the Data Processor and receives a request from an individual to exercise, they right, we will transfer such request promptly to the data controller unless otherwise indicated in any contractual agreement. We shall not be required to inform data subjects directly thereof, as this remains the responsibility of the data controller.

In any case, you will receive a response within one month of your request. This period may be extended by up to two more months if needed. Please note that the requested information is free of charge.

Please contact Crayon's Data Protection Officer if you wish to exercise your privacy rights:

[Contact Crayon's DPO](#)

Your right to object

If you no longer wish to receive marketing communications from us, you can unsubscribe by clicking the unsubscribe link in our email communications. Alternatively, you can send us a brief email to: Opt-Out@Crayon.com. If you object to receiving communications from us, we keep track of this in our “unsubscribe-list” to avoid sending you any further communications.

Your right to submit a complaint

If you are concerned that a data processing activity associated with Crayon may have infringed your data privacy rights or the European Union General Data Protection Regulation or any other applicable law, please submit our privacy complaint form to: DPO@Crayon.com.

[Download our Privacy Complaint Form](#)

Your right to complaint with a supervisory authority

If you remain dissatisfied, you can make a complaint about the way we process your personal data with the relevant data supervisory authority of the country in which you reside or work or where the alleged breach has occurred.

Automated decision making

Crayon does not carry out automated decision-making processes, including profiling, unless you have explicitly authorized us to do so. In that case, we would inform you about the logic used in the decision and the meaning and expected consequences of such processing to you.

1.1.1.5 Updates

We review and update our Privacy Policy from time to time to keep it clear, accurate, and aligned with legal, technical, and business developments. The latest version is always available at [Welcome to our Trust Center - Crayon](#), with the date showing when it was last updated. If any changes could affect your rights, we will provide advance notice. General updates will also be communicated in the footer of our outgoing emails.

Last Updated: 16 April 2025

1.1.1.6 Historical

Processing for marketing communications

What data do we process?

- We collect your contact details (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you interact or engage with us, such as when you subscribe to our marketing communications, sign up to our services, attend an event or when you have expressed an interest in our services. This may also include where you have provided your consent to a third party to share your information for marketing purposes.
- Additionally, when you engage with us, we collect certain information automatically from your device such as your IP address, your operating system, your browser ID, collecting this information enables us to better understand who engages with us and what your interests and preferences are. Some of this information may be collected using cookies and similar tracking technologies.

Why we process your data

Our purpose for collecting and further processing your contact details is so we can provide you with marketing and promotional communications about our services. We handle your personal data based on our legitimate interest pursuant to Article 6 (1) (f) General Data Protection Regulation (GDPR)

What we do with it

- To use your personal data to manage our communications which you have expressed interest in (direct marketing).
- To prepare and distribute marketing materials to customers and potential customers and prospects.
- To measure the effectiveness of our marketing campaigns and develop our marketing strategy.
- To manage analytics information so we can provide a personalized service, monitor the impact of our work and improve marketing communications.

How long we keep it

We retain your personal data for as long as is necessary to fulfill the purpose for which it was collected. Where you have opted out of receiving Crayon marketing communication, name and email will remain on our opt-out list to ensure that your request to be removed from future communications is respected.

What about your rights

In any case, you may proactively manage your preferences or opt-out of communications (unsubscribe) at any time using the unsubscribe link provided in the marketing email communications or by sending a short email to opt-out@crayon.com. In case that you have unsubscribed from our marketing communications (i.e. object to the processing) we will stop sending you any marketing materials. The rights available to you depend on our reason for processing your information, you may address your communications and exercise your rights by using our available forms.

How to exercise your privacy rights

If you would like to exercise your data subject rights towards Crayon in accordance with the European Union General Data Protection Regulation or any other applicable law, please submit our privacy request form to: DPO@Crayon.com.

[Download our Privacy Request Form](#)

Where Crayon is the Data Controller, you have the following rights:

- Right to Information: get information about the personal data processing by us, in addition to that information already provided by us through its privacy notices.
- Right of Access: get confirmation whether we are processing your personal data and, if so, get a description and copy of that data.
- Right to Rectification: get a rectification of any inaccuracies of your personal data which we are processing.
- Right to Erasure, to Restrict and to Object: get us to erase or stop or restrict the processing of your personal data.
- Right to Data Portability: get a copy of your personal data transmitted by us to another data controller in a structured, commonly used, and machine-readable format.

Where Crayon acts as the Data Processor and receives a request from an individual to exercise their rights, we will transfer such request promptly to the data controller unless otherwise indicated in any contractual agreement. We shall not be required to inform data subjects directly thereof, as this remains the responsibility of the data controller.

In any case a response will be made within one month of receipt of your request. This period may be extended by two further months where

necessary. Please note that you will receive the requested information free of charge.

Your right to object to direct marketing

If at any time, you no longer want to receive marketing communications from us, we can remove your contact details from our marketing lists by using the unsubscribe link in the email communications we send or simply send us a short email to: Opt-Out@Crayon.com

Your right to submit a complaint

If you are concerned that a data processing activity associated with Crayon may have infringed your data privacy rights or the European Union General Data Protection Regulation or any other applicable law, please submit our privacy complaint form to: DPO@Crayon.com.

[Download our Privacy Complaint Form](#)

Your right to complaint with a supervisory authority

If you remain dissatisfied, you can make a complaint about the way we process your personal data with the relevant data supervisory authority of the country in which you reside or work or where the alleged breach has occurred.

1.1.1.7 Our Data Protection Measures

1.1.1.7.1 Crayon Sub-Processors

Australia	Anglepoint Group, Inc
Australia	Crayon Software Experts Australia Pty Ltd (BidCo)
Australia	Crayon Australia Pty Ltd
Australia	Crayon Australia Holding Pty Ltd
Australia	Dynamic Business IT Solutions Pty Ltd

Australia	Emt Distribution Pty Ltd
Australia	Navicle Pty Ltd
Australia	Parallo Pty Ltd
Australia	Rhipe Australia Pty Ltd
Australia	Rhipe Pty Ltd
Australia	Rhipe Cloud Solutions Pty Ltd
Australia	Rhipe Dynamics Pty Ltd
Australia	Rhipe Solutions Australia Pty Ltd
Australia	SmartEncrypt Pty Ltd
Australia	Data Confidence Solutions Pty Ltd
Australia	SmartEncrypt Pty Ltd
Austria	Crayon Austria GmbH
Bulgaria	Crayon Bulgaria OOD
Czech Rep.	Crayon Czech Republic and Slovakia s.r.o.
Denmark	Crayon A/S
Denmark	Crayon Consulting A/S

Finland	Crayon OY
France	Crayon France SAS
Germany	Anglepoint Group Germany
Germany	Crayon Deutschland GmbH
Germany	Crayon Global Services GmbH
Hong Kong	Rhipe Hong Kong Limited
Hungary	Crayon Magyarország Korlátolt Felelősségű Társaság
Iceland	Crayon Iceland ehf.
Iceland	Fletir
Iceland	Huxrad Ehf
Iceland	ICE Distribution hf
Iceland	Sensa Ehf
India	Anglepoint India Private Limited
India	Crayon IT Services Private Limited
India	Crayon Software Experts India Private Limited
India	Kryptos Networks Pvt Ltd

India	Kryptos Technologies Private Limited
Indonesia	PT Krayon Konsultan Indonesia
Indonesia	PT Rhipe International Indonesia
Ireland	Anglepoint (Ireland) Limited
Japan	Rhipe Japan K. K.
Latvia	SIA Crayon Latvia
Macedonia	Krejon Makedonija DOO
Malaysia	Atria Solutions Sdn Bhd
Malaysia	Crayon Software Experts Malaysia Sdn Bhd
Malaysia	Rhipe Malaysia Sdn. Bhd.
Mauritius	Crayon Mauritius Ltd.
Netherlands	Crayon BV
Netherlands	Sequent B.V.
New Zealand	Parallo Limited
New Zealand	Rhipe New Zealand Ltd
Norway	Complit AS

Norway	Crayon AS
Norway	Crayon Constellation AS
Norway	Crayon Group AS
Norway	Crayon Group Holding ASA
Norway	Crayon IOT AS
Norway	Esito AS
Norway	Inmeta Consulting AS
Norway	Inmeta Management Consulting AS
Norway	Puzzlepart AS
Philippines	Crayon Software Experts Philippines Inc
Philippines	Rhipe Philippines, Inc
Philippines	Rhipe Technology Philippines, Inc
Poland	Crayon Poland sp. z o.o.
Portugal	Crayon Software Licensing Unipessoal LDA
Romania	Crayon Software Experts Romania S.R.L.
Saudi Arabia	Wadi al omar co for IT

Serbia	Crayon d.o.o. Beograd (Novi Beograd)
Singapore	Crayon Pte Ltd
Singapore	Atria Solutions Technologies Pte Ltd
Singapore	Emt Distribution Pte Ltd
Singapore	Rhipe Singapore Pte Ltd
Slovenia	Crayon, Celovite IT Rešitve, d.o.o.
South Africa	Crayon South Africa
South Korea	Rhipe Licensing Technology Korea Ltd
Spain	Crayon Software Experts Spain SL
Sri Lanka	Crayon Software Lanka Pvt Ltd
Sri Lanka	Rhipe Lanka (Pvt) Limited
Sweden	Crayon AB
Switzerland	Anglepoint Switzerland
Switzerland	Crayon Schweiz AG
Thailand	Rhipe Technology (Thailand) Co. Ltd
UAE	Crayon DMCC UAE

UK	Anglepoint (UK) Limited
UK	Crayon Limited
Ukraine	LLC «Crayon Ukraine»
US	Anglepoint Group Inc
US	Crayon Software Experts Holding LLC
US	Crayon Software Experts LLC
US	Rhipe Solutions LLC
Canada	Anglepoint International Holdings LLC (Canada)
Canada	Anglepoint ULC

FOR PARTNERS & SUPPLIERS

1.1.2 Crayon's Secured Ecosystem commitments and expectations towards Partners & Suppliers.

1.1.2.1 Secured Productivity Policy

Crayon's Secured Productivity Policy for team members is a critical component within Crayon's integrity, compliance, security and privacy architecture. This policy applies to all Crayon team members, which means Crayon's board of directors and all employees, consultants, contractors, sub-contractors, directors, executive officers, and affiliates in which Crayon owns more than 50% of the voting controls. Every team member is held accountable for any neglect of their duty to safeguard our integrity or protect the data they are entrusted to process, in accordance with Crayon's global rules to secure its business operations, data processing and business ecosystem.

[Secured Productivity Policy 2024](#)

1.1.2.2 Business Integrity

How we champion human rights and practice responsible to earn the trust of our customers, partners and suppliers, and what integrity expectations we have towards Crayon partners and suppliers.

1.1.2.2.1 Partner Integrity Requirements

Whereas we are committed to the highest standards of business integrity, we also expect our partners and suppliers to strictly adhere to our Third Party Code of Conduct:

[Download Crayon's Third Party Code of Conduct](#)

1.1.2.2.2 Integrity Assurance Measures

Whereas Crayon upholds the highest standards of business integrity, we expect our partners and suppliers to also implement equivalent integrity assurance measures:

- Global ISO 37001 Certification
- Anti-bribery management system auditing
- Dedicated integrity management roles
- Integrity policy and role-based instructions

- Monitoring of integrity training completions
- Disclosure policy for conflicts of interest
- Dual approval procedures for financial transactions with a no cash payments policy
- Auditing of financial statements by an independent third party
- Procedures for integrity risk management
- Confidential whistleblower channel
- Procedures for managing integrity concerns
- Procedures for managing integrity breach notifications
- Procedures for ensuring compliance with international sanctions
- Procedures to ensure compliance with applicable laws on labour, human rights, and decent working conditions
- Due diligence on partners and suppliers to assess their integrity maturity

1.1.2.2.3 Human Rights

The fundamental principles of individual dignity and the protection of human rights serve as the foundation for the conduct we expect from every Crayon team member and employee within our supply chain.

At Crayon, fostering a work environment that promotes respect for everyone we work with is of utmost importance to us. We are committed to upholding internationally recognized human rights across all aspects of our operations, and we expect the same level of commitment from our partners and suppliers.

We take great pride in aligning with the United Nations Guiding Principles on Business and Human Rights, integrating responsible business conduct into our policies and management systems. Our dedication extends to adhering to the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises, the International Bill of Human Rights, and the core conventions of the International Labor Organization.

Furthermore, we promise to protect our employees' right to collective bargaining and freedom of association, while actively working towards eliminating forced labour, child labour, and employment discrimination.

We kindly invite you to read Crayon's 202a ESG Report for more information on our commitment and action in championing human rights, health and safety, and diversity, equity and inclusion:

[Crayon's ESG Report](#)

[Crayon's NTA Statement](#)

1.1.2.2.4 Responsible Sourcing

Crayon's 2024 ESG report documents the commitment of our leadership and the concerted efforts of our team members in practicing responsible sourcing and promoting human rights and decent working conditions. It highlights the accomplishments already achieved, sets forth our short and medium-term targets, and elaborates on our strategies to attain them successfully.

The Norwegian Transparency Act (NTA) took effect on July 1, 2022, with the aim of advancing the protection of fundamental human rights and promoting decent working conditions. It also serves to facilitate public access to information concerning how enterprises are addressing and mitigating the adverse impacts of their operations on human rights and decent working conditions.

In honoring Crayon's own commitment to the Norwegian Transparency Act, we have produced a dedicated Human Rights Transparency Statement for the 2023 reporting period that also states our short- and long-term targets and provides an update on the milestones Crayon has reached over the past 18 months.

[Crayon's NTA Statement](#)

[Crayon's ESG Report](#)

1.1.2.3 Information Security

How we protect confidential business and personal data to earn the trust of our customers, partners and suppliers, and our information security expectations towards Crayon's partners and suppliers.

1.1.2.3.1 Technical & Organizational Security Measures

Whereas Crayon upholds the highest standards of information security to protect confidential business and personal data, we expect our partners and suppliers to also implement equivalent technical and organizational security measures:

- Global ISO 27001 Certification

- Internal information security management system auditing
- Dedicated information security management roles
- Information security policy and role-based instructions
- Procedures for information security risk management
- Background checks in accordance with applicable laws
- Procedures for managing information security events and incidents
- Procedures for managing information security breach notifications
- Application of critical/high risk security patches within 14 days
- Tools and processes to verify confidentiality agreement and security training completions
- Tools and processes to detect suspicious account activity and initiate automated responses
- Tools and processes to detect device activity and initiate automated responses
- Business Continuity and Disaster Recovery planning with trained emergency response teams and regularly testing of resumption plans
- Penetration testing on Software, Platforms and Infrastructure.
- Procedures for vulnerability management to ensure all high/critical vulnerabilities are remediated within defined timelines
- Due diligence on suppliers to assess their security maturity
- Multi-Factor Authentication to protect internal access into the organization's IT environment and protect customer access to product or service platforms
- Procedures for notifying customers of vulnerabilities in product/service platforms
- Encryption of data in transit using minimum supported methods
- Encryption of data at rest using industry recommended algorithms
- Segregation of stored customer data within product/service platform infrastructures
- Mechanisms for enabling customers to define their data storage location, where required to comply with legal obligations
- Perimeter security services in place such as WAF and IDS
- Procedures to ensure compliance with secured development frameworks such as NIST
- Code reviews before changes are made to production versions of software provided by the organization
- Penetration testing on applications provided by the organization on an annual basis or more frequently

- Multi-Factor Authentication on all access to development and testing environments

1.1.2.4 Data Protection

How we protect personal data across our global organization to earn the trust of our customers, partners and suppliers, and our data protection expectations towards Crayon's partners and suppliers.

1.1.2.4.1 Data Protection Measures

Whereas Crayon upholds the highest standards of data protection to safeguard the privacy rights of those individuals whose personal data we are entrusted to process, we expect our partners and suppliers to also implement equivalent data protection measures:

- Global ISO 27701 Certification
- Compliance with the principles of the European Union General Data Protection Regulation and applicable legislation
- Privacy information management system auditing
- Dedicated data protection management roles
- Data protection policy and role-based instructions
- Procedures for data protection risk management
- Procedures for managing requests related to individual privacy rights
- Procedures for managing data privacy events and incidents
- Procedures for managing personal data breach notifications
- Tools and processes to verify privacy training completions
- Due diligence on partners and suppliers to assess their privacy maturity
- Mechanisms for enabling customers to define their personal data storage location, where required to comply with legal obligations
- Safeguards for protecting personal data related to international transfers (e.g., Data Transfer Impact Assessments (DTIA))
- Procedures for performing Data Protection Impact Assessments (DPIA)

1.1.2.4.2 Data Protection Officer

Data Protection Officer Alyssa DE LEON

Email Address DPO@Crayon.com

Postal Address Gullhaug Torg 5 0484, OSLO, Norway

This Data Privacy Policy explains how we collect and use personal data in a number of different situations.

The information in this policy is important, so we have tried to make it very easy to navigate. Use the links to locate the sections that are relevant to you. These will help you find out more about how we collect, use and share personal information in our relationship or interaction with you.

We use your personal data to administer and manage the relationship between the us and the entity you represent or are employed by, which may be a partner or supplier of Crayon.

Enable partner or supplier administration

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you liaise with us on behalf of our partner or suppliers, or your personal data may come from your employer, and other business partners.
- We handle your personal data in alignment with our legitimate interest in administering and managing our relationships with partners or suppliers. This includes maintaining necessary records, obtaining pricing information, finalizing procurement processes for goods and services, and communicating with you regarding relevant business matters. Additionally, we may create, manage, store and maintain a comprehensive database of Crayon suppliers.
- If your organisation becomes our supplier or partner, we will store your personal data for this purpose as long as the organisation you represent is our supplier or partner, however for a shorter period if we receive information that you no longer represent the organisation.

Enable supplier due diligence

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you liaise with us on behalf of our Supplier or from your employer or public sites, e.g., your company website.
- We handle your personal data in line with our legal obligations and our legitimate interest in performing due diligence on partners or suppliers. Prior to initiating any new partnerships or

supplier relationships, we conduct thorough due diligence to ensure the suitability of the organization and effective management of any associated risks. Our due diligence activities may encompass security, privacy, and integrity checks, subject to the extent permitted by applicable laws.

- If your organisation becomes our supplier or partner, we will store your personal data for this purpose as long as the organisation you represent is our supplier or partner, however for a shorter period if we receive information that you no longer represent the organisation.

Enable Prequalification and tendering

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you liaise with us on behalf of our Supplier or from your employer or public sites, e.g., your company website.
- We handle your personal data in line with our legal obligations and our legitimate interest to identify, evaluate and select your business as a supplier when we need to release tenders for goods or services that your company may provide. We process your personal data to be able to communicate with you in connection with the tender process.
- If your organisation becomes our supplier or partner, we will store your personal data for this purpose as long as the organisation you represent is our supplier or partner, however for a shorter period if we receive information that you no longer represent the organisation.

1.1.2.4.3 Crayon Sub-Processors

The selection of sub-processors used in providing Crayon Services may vary based on customer preferences.

Crayon Group Holding ASA	Norway
Anglepoint Group Inc	Australia
Crayon Australia Holding Pty Ltd	Australia
Navicle Pty Ltd	Australia
Crayon Australia Pty Ltd	Australia

Crayon Software Experts Australia Pty Ltd (BidCo)	Australia
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Rhipe Limited Pty Ltd	Australia
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Rhipe Cloud Solutions Pty Ltd	Australia
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Rhipe Australia Pty Ltd	Australia
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Rhipe Solutions Australia Pty Ltd	Australia
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Rhipe Solutions LLC	Australia
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Dynamic Business IT Solutions Pty Ltd	Australia
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Emt Distribution Pty Ltd	Australia
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Data Confidence Solutions Pty Ltd	Australia
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SmartEncrypt Pty Ltd	Australia
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Parallo Pty Limited atf Parallo Unit Trust	Australia
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Crayon Austria Gmbh	Austria
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Crayon Bulgaria OOD	Bulgaria
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Anglepoint Canada Inc.	Canada
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Crayon Czech Republic and Slovakia s.r.o.	Czech Republic
Crayon A/S	Denmark
Crayon Consulting A/S	Denmark
Crayon Estonia OÜ	Estonia
Crayon OY	Finland
Crayon Deutschland GmbH	Germany
Crayon Global Services GmbH	Germany
Anglepoint Group GmbH	Germany
Rhipe Hong Kong	Hong Kong
Crayon Magyarország Korlátolt Felelősségű Társaság.	Hungary
Ice Distributions hf	Iceland
Crayon Iceland ehf	Iceland
Sensa ehf.	Iceland
Crayon Software Experts India Pvt. Ltd.	India

Kryptos Networks Pvt. Ltd	India
Kryptos Technologies Pvt. Ltd.	India
Crayon IT Services Pvt. Limited	India
Anglepoint India Private Limited	India
PT Krayon Konsultan Indo	Indonesia
PT rhipe Indonesia	Indonesia
Anglepoint Ireland Limited	Ireland
Crayon Japan K.K.	Japan
Wadi Al Omar for Information Technology	Kingdom of Saudi Arabia
Crayon Regional Headquarters	Kingdom of Saudi Arabia
Crayon Lithuania UAB	Lithuania
Krejon Makedonija DOO	Macedonia
Crayon Software Experts Malaysia Sbn. Bhd	Malaysia

Rhipe Malaysia Sdn Bhd	Malaysia
Crayon Mauritius Limite	Mauritius
Crayon BV	Netherlands
Crayon New Zealand Ltd	New Zealand
Crayon AS	Norway
Complit AS	Norway
Crayon Group A	Norway
Crayon Consulting A	Norway
Inmeta Management Consulting AS	Norway
Parallo Limited	New Zealand
Rhipe Philippines Inc	Philippines
Rhipe Technology Philippines Inc	Philippines
Crayon Poland sp. z o.o	Poland
Crayon Software Licencing Unipessoal LDA	Portugal

Crayon Software Consulting and Trading W.L.L.	Qatar
Crayon Software Experts Romania S.R.L	Romania
Crayon d.o.o. Beograd (Novi Beograd)	Serbia
Crayon Pte Ltd	Singapore
Emt Distribution Pte Ltd	Singapore
Rhipe Singapore Pte Ltd	Singapore
CRAYON, celovite IT rešitve, d.o.o.)	Slovenia
Software Wholesale International Inc.	Software Wholesale International Inc.
Crayon Africa SA	South Africa
Crayon South Korea Ltd	South Korea
Rhipe Lanka Pvt. Ltd	Sri Lanka
Crayon Software Lanka	Sri Lanka
Crayon AB	Sweden
Crayon Schweiz AG	Switzerland

Crayon (Thailand) Co., Ltd.	Thailand
Crayon DMCC	UAE
Crayon Limited	UK
Anglepoint Limited	UK
Fisher Information Technology Services Holdings	UK
Fisher IT Asset Consulting Limited	UK
Fisher Analytics and Control Technology Limited	UK
LLC Crayon Ukraine	Ukraine
Crayon Software Experts Holdings LLC	USA
Crayon Software Experts LLC	USA
Anglepoint Group. Inc	USA
Anglepoint International (Canada) Holdings LLC	USA

Third-Party Processors

As part of the delivery of our Services to our Customers, Crayon may use data processors with access to certain Customer Data that may include personal data (each, a “Sub-processor”).

To ensure transparency and provide you with control over your data, you can request a list of our current Sub-processors. Please include the name of the controller and the specific service provided by Crayon in your request.

To request this information, please contact us at dpo@crayon.com

1.1.2.5 Updates

We review and update our Privacy Policy from time to time to keep it clear, accurate, and aligned with legal, technical, and business developments. The latest version is always available at [Welcome to our Trust Center - Crayon](#), with the date showing when it was last updated. If any changes could affect your rights, we will provide advance notice. General updates will also be communicated in the footer of our outgoing emails.

Last Updated: 16 April 2025

1.1.2.6 Historical

How we protect personal data across our global organization to earn the trust of our customers, partners and suppliers, and our data protection expectations towards Crayon's partners and suppliers.

1.1.2.6.1 Data Protection Measures

Whereas Crayon upholds the highest standards of data protection to safeguard the privacy rights of those individuals whose personal data we are entrusted to process, we expect our partners and suppliers to also implement equivalent data protection measures:

- Global ISO 27701 Certification
- Compliance with the principles of the European Union General Data Protection Regulation and applicable legislation
- Privacy information management system auditing
- Dedicated data protection management roles
- Data protection policy and role-based instructions
- Procedures for data protection risk management
- Procedures for managing requests related to individual privacy rights
- Procedures for managing data privacy events and incidents
- Procedures for managing personal data breach notifications
- Tools and processes to verify privacy training completions
- Due diligence on partners and suppliers to assess their privacy maturity

- Mechanisms for enabling customers to define their personal data storage location, where required to comply with legal obligations
- Safeguards for protecting personal data related to international transfers (e.g., Data Transfer Impact Assessments (DTIA))
- Procedures for performing Data Protection Impact Assessments (DPIA)

1.1.2.6.2 Data Protection Officer

Data Protection Officer Alyssa DE LEON

Email Address DPO@Crayon.com

Postal Address Gullhaug Torg 5 0484, OSLO, Norway

1.1.2.6.3 Crayon Sub-Processors

Australia Anglepoint Group, Inc

Australia Crayon Software Experts Australia Pty Ltd (BidCo)

Australia Crayon Australia Pty Ltd

Australia Crayon Australia Holding Pty Ltd

Australia Dynamic Business IT Solutions Pty Ltd

Australia Emt Distribution Pty Ltd

Australia Navicle Pty Ltd

Australia Parallo Pty Ltd

Australia Rhipe Australia Pty Ltd

Australia	Rhipe Pty Ltd
Australia	Rhipe Cloud Solutions Pty Ltd
Australia	Rhipe Dynamics Pty Ltd
Australia	Rhipe Solutions Australia Pty Ltd
Australia	SmartEncrypt Pty Ltd
Australia	Data Confidence Solutions Pty Ltd
Australia	SmartEncrypt Pty Ltd
Austria	Crayon Austria GmbH
Bulgaria	Crayon Bulgaria OOD
Czech Rep.	Crayon Czech Republic and Slovakia s.r.o.
Denmark	Crayon A/S
Denmark	Crayon Consulting A/S
Finland	Crayon OY
France	Crayon France SAS
Germany	Anglepoint Group Germany
Germany	Crayon Deutschland GmbH

Germany	Crayon Global Services Gmbh
Honk Kong	Rhipe Hong Kong Limited
Hungary	Crayon Magyarország Korlátolt Felelősségű Társaság
Iceland	Crayon Iceland ehf.
Iceland	Fletir
Iceland	Huxrad Ehf
Iceland	ICE Distribution hf
Iceland	Sensa Ehf
India	Anglepoint India Private Limited
India	Crayon IT Services Private Limited
India	Crayon Software Experts India Private Limited
India	Kryptos Networks Pvt Ltd
India	Kryptos Technologies Private Limited
Indonesia	PT Krayon Konsultan Indonesia
Indonesia	PT Rhipe International Indonesia
Ireland	Anglepoint (Ireland) Limited

Japan	Rhipe Japan K. K.
Latvia	SIA Crayon Latvia
Macedonia	Krejon Makedonija DOO
Malaysia	Atria Solutions Sdn Bhd
Malaysia	Crayon Software Experts Malaysia Sdn Bhd
Malaysia	Rhipe Malaysia Sdn. Bhd.
Mauritius	Crayon Mauritius Ltd.
Netherlands	Crayon BV
Netherlands	Sequent B.V.
New Zealand	Parallo Limited
New Zealand	Rhipe New Zealand Ltd
Norway	Complit AS
Norway	Crayon AS
Norway	Crayon Constellation AS
Norway	Crayon Group AS
Norway	Crayon Group Holding ASA

Norway	Crayon IOT AS
Norway	Esito AS
Norway	Inmeta Consulting AS
Norway	Inmeta Management Consulting AS
Norway	Puzzlepart AS
Philippines	Crayon Software Experts Philippines Inc
Philippines	Rhipe Philippines, Inc
Philippines	Rhipe Technology Philippines, Inc
Poland	Crayon Poland sp. z o.o.
Portugal	Crayon Software Licensing Unipessoal LDA
Romania	Crayon Software Experts Romania S.R.L.
Saudi Arabia	Wadi al omar co for IT
Serbia	Crayon d.o.o. Beograd (Novi Beograd)
Singapore	Crayon Pte Ltd
Singapore	Atria Solutions Technologies Pte Ltd
Singapore	Emt Distribution Pte Ltd

Singapore	Rhipe Singapore Pte Ltd
Slovenia	Crayon, Celovite IT Rešitve, d.o.o.
South Africa	Crayon South Africa
South Korea	Rhipe Licensing Technology Korea Ltd
Spain	Crayon Software Experts Spain SL
Sri Lanka	Crayon Software Lanka Pvt Ltd
Sri Lanka	Rhipe Lanka (Pvt) Limited
Sweden	Crayon AB
Switzerland	Anglepoint Switzerland
Switzerland	Crayon Schweiz AG
Thailand	Rhipe Technology (Thailand) Co. Ltd
UAE	Crayon DMCC UAE
UK	Anglepoint (UK) Limited
UK	Crayon Limited
Ukraine	LLC «Crayon Ukraine»
US	Anglepoint Group Inc

US	Crayon Software Experts Holding LLC
US	Crayon Software Experts LLC
US	Rhipe Solutions LLC
Canada	Anglepoint International Holdings LLC (Canada)
Canada	Anglepoint ULC

FOR INDIVIDUALS

1.1.3 Crayon's Secured Productivity commitments towards Employees, Applicants and Visitors.

1.1.3.1 Secured Productivity Policy

Crayon's Secured Productivity Policy for team members is a critical component within Crayon's integrity, compliance, security and privacy architecture. This policy applies to all Crayon team members, which means Crayon's board of directors and all employees, consultants, contractors, sub-contractors, directors, executive officers, and affiliates in which Crayon owns more than 50% of the voting controls. Every team member is held accountable for any neglect of their duty to safeguard our integrity or protect the data they are entrusted to process, in accordance with Crayon's global rules to secure its business operations, data processing and business ecosystem.

Secured Productivity Policy 2024

1.1.3.2 Job Applicants

Crayon is committed to protecting the privacy and security of your personal data. This Data Privacy Policy explains how Crayon Group and its affiliates ("Crayon," "we," "us") collect and handle your personal data.

While we are dedicated to assessing your suitability for employment opportunities with us, we respect your right to privacy and are committed to honouring our obligations as a data controller whenever we process your personal data during the talent acquisition process.

What personal data do we collect?

We collect the following types of personal data during the talent acquisition process:

- Identification data: first name and last name;
- Contact data: email address, address and phone numbers
- Employment background information: information contained in your CV or covering letter, educational and professional details including higher education, certifications, previous employment history, and other information you provide to us; and,
- Interviews data: such information includes interview notes, assessment results and feedback;
- Pre-employment vetting: depending on your position or activity to be developed at Crayon, other data about you may be collected for pre-employment vetting. If a pre-employment vetting is required, it will take place to the extent permitted by law.

By default, we do not collect sensitive personal data during the talent acquisition process. However, we can collect sensitive personal data about you to the extent permitted by applicable laws (e.g., equal opportunity laws) and to support our efforts to create an

inclusive and diverse work environment. All our data processing, especially when involving sensitive personal data, respect the principles of transparency and non-discrimination.

How do we collect your personal data?

Depending on the country in which you apply, we collect your personal data from the following sources:

- Personal data provided directly by you when you submit your applications for our consideration. We may collect this data in a variety of ways. For example, data might be contained in application forms, CVs or resumes (obtained from you or from professional social media providers), obtained from your identity documents, or collected through interviews or other forms of assessment.
- Personal data received from third parties, we may receive personal data about applicants from third parties who provide services to us, including but not limited to recruiting agencies, professional social media providers, internal or external referrals and from pre-employment vetting service providers.

What is our legal basis for processing your personal data?

When you apply for a job with us, we will process your personal data in accordance with the General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA) and other applicable data protection laws. We rely on the following lawful bases to process your data: taking steps at your request prior to entering into a contract, fulfilling our legitimate interests, obtaining your explicit consent, and complying with legal obligations (such as maintaining records, monitoring equal opportunities, and verifying your right to work in the relevant jurisdiction). We will only collect and process personal data that is relevant and necessary for assessing your application as follows:

- To administer your application, schedule interviews, and assess your suitability for the role you have applied for.
- To address any queries or requests you have regarding our talent acquisition process.
- To send you a formal employment offer if you are deemed a suitable candidate for the position.
- To verify applicant's eligibility to work in the country where the position is located before employment begins.
- To conduct pre-employment vetting, if required by local laws and necessary for the position you are applying for.
- To ensure compliance with equal opportunity obligations, if required by local laws in the territory where the job position is based.

How do we share your personal data?

Due to our global operation, your personal data may need to be processed or accessed in countries other than your jurisdiction, including, for example, when shared or accessed by our service providers or other affiliates. We only transfer personal data to another country in accordance with applicable Data Protection Laws. We take appropriate measures to ensure that your personal data receives an adequate level of protection, including by using contractual obligations or other data transfer mechanisms that were pre-approved by applicable data protection authorities to ensure your personal data is protected.

How do we protect your personal data?

In accordance with applicable laws, we maintain robust and resilient security measures to protect personal data against accidental loss, compromise or any form of unauthorized access, disclosure, or processing, including:

- Technical measures: We implement standards, protocols, and technologies such as encryption, intrusion detection and data loss prevention, and we monitor our systems and data centers to prevent and mitigate data breaches.
- Organizational measures: We implement global and role-specific instructions and training on security and privacy which covers physical security controls related to our facilities and remote working.

Automated decision making

Even when we use third party recruiting tools with certain automated features. We do not make any automated decisions as part of the talent acquisition process. These are always reviewed by team members in our Talent Acquisition team for every processing activity.

How long do we retain your personal data?

Your personal data will be retained for one year from the end of the talent acquisition process. Once this retention period expires, we will request your consent to retain your data for another year if you are interested in other job opportunities with us. We may retain your data for a longer period only to the extent necessary and as required by law. If you accept an offer of employment, any relevant personal data collected during the pre-employment period will become part of your personnel record and will be retained in accordance with our internal data retention plan.

What are your data subject rights?

This is not a complete list of rights; rights may vary according to applicable law. Additionally, some of these rights are not absolute and can only be exercised under specific circumstances.

- Access your personal data (commonly known as a “data subject access request”).
- Request that we update or correct any errors in your personal data.

- Erase all or part of your personal data if there is no legal basis for processing it, or if the legal basis has ceased to apply, subject to our data retention obligations.
- Restrict the processing of your personal data when you have asked us to check its accuracy, and in other cases to the extent that such a request does not conflict with a legal requirement or obligation to process your personal data, or an overriding legitimate interest we have to process your personal data.
- Export a copy of your personal data in a format that allows you to reuse it.
- Request human intervention if a recruiting or hiring process involves an automated decision.

Furthermore, you may object to the processing of your personal data where the processing is based on a legitimate interest to the extent that such request does not conflict with a legal requirement or obligation to process your personal data, or an overriding legitimate interest we have to process your personal data.

You may withdraw your consent to future processing at any time (if applicable) by contacting using the details provided below.

Depending on the applicable laws regarding your personal data, we may only be able to fulfil certain requests. If we refuse your request, we will explain your legal rights, the reason for our refusal, and any recourse available to you. For any questions or requests, please contact our team at

dpo@crayon.com

We will respond to your request within 30 days or earlier if we can or are required to do so by applicable law.

How to contact us?

The controller of your personal data is the Crayon affiliate responsible for hiring. If you have any questions or concerns about how we are handling your data, please email us at

dpo@crayon.com

Status of and changes to this Notice

Status of and changes to this Notice

This notice does not form part of any employment contract or other contract to provide services. We may update this notice at any time and changes will appear on this page.

1.1.3.3 Office Visitors

How we provide personal safety, champion human rights and protect personal data to earn the trust of our office visitors.

1.1.3.3.1 Personal Safety

To ensure your safety and welfare whenever you visit us, we kindly ask you to:

- Review our safety guidance upon arrival.
- Follow the instructions of our team members in the event of an emergency during your visit.

1.1.3.3.2 Human Rights

The fundamental principles of individual dignity and the protection of human rights serve as the foundation for the conduct we expect from every person associated with our organization. This encompasses both direct employees of Crayon and team members employed within our supply chain.

At Crayon, fostering a work environment that promotes respect for our customer's employees is of utmost importance to us. We are committed to upholding internationally recognized human rights across all aspects of our operations, and we expect the same level of commitment from our partners and suppliers.

For more details on Human rights, Health and safety (HSE), Diversity, Equity and Inclusion (DEI), please refer to Crayon's ESG 2024 report.

[Download Crayon's ESG Report](#)

1.1.3.3.3 Data Protection

While we are committed to ensuring your safety, and the security of our offices whenever you visit us, we respect your right to privacy and are committed to honoring our obligations as a data controller, whenever we process your personal data.

Whenever you visit one of our offices around the world, we rely on the lawful basis of legitimate interest to:

- Collect your personal data by asking you to sign into our visitor registration system, which includes your first name and last name.

- Process your personal data for the purposes of registration and access management, and providing everyone with a safe and secure environment.
- Retain your personal data for 5 days, before deletion.

Any personal data we collect to enable safe and secured office visits will not be shared or transfer with any other third parties.

To exercise your privacy rights towards us, please contact us Crayon's Data Protection Officer via email:

[Contact Crayon's Data Protection Officer](#)

1.1.3.4 Website Visitors

This Data Privacy Policy explains how we collect and use personal data in a number of different situations.

The information in this policy is important, so we have tried to make it very easy to navigate. Use the links to locate the sections that are relevant to you. These will help you find out more about how we collect, use and share personal information in our relationship or interaction with you.

We use your personal data whenever you visit one of our websites without having a business relationship, e.g., by contacting us through our contact forms on our website, by phone or by sending us an e-mail or a message at our social media account.

Enable communication

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you contact us using the contact form provide in our website, phone, social media message or via e-mail.
- We handle your personal data in alignment with our legitimate interest in administering and managing your request depending on the country and service within the scope to further align our business processes with the needs of visitors to the website.

Provide you with marketing communications

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, directly from you or received from third-party data providers, subject to controls confirming that the third party legally acquired the information and has the right to provide the information to us for use in our marketing

communications. We also collect IP-address statistics around email opening and clicks using industry standard technologies to help us monitor and improve our marketing communications.

- We handle your personal data in alignment with our legitimate interest in administering and managing our marketing and promotional communications about our services relevant to your organization, to manage our communications which you have expressed interest to measure the effectiveness of our marketing campaigns and develop our marketing strategy.

Provide you with newsletters

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, directly from you. We also collect IP-address statistics around email opening and clicks using industry standard technologies to help us monitor and improve our marketing communications.
- We handle your personal data in alignment with our legitimate interest in administering and managing our newsletter and to manage analytics information so we can provide a personalized service, monitor the impact of our work and improve our communication strategies. We also collect IP-address statistics around email opening and clicks using industry standard technologies to help us monitor and improve our newsletter communications.

Enable you to register to our video conference, webinar or live broadcast event

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you fill in our registration forms.
- We handle your personal data in alignment with our legitimate interest in administering and managing the registration process, organization and sending you update information with the event details. We record some events, and all presenters will have their image and audio captured in the recording. If you are an attendee, you may have the option of sharing your image and audio during the session. If you choose to do so, this will also be captured in the recording. For recorded events we will also email you a link to the recording once the event has concluded
- We retain your personal data until the event is completed. However, a participant list that you are part of, will be saved for one year in order for us to be able to follow up your participation in the event and invite you to similar events. If events are conducted jointly with a Crayon's partner, the participation list may be shared with that partner for verification purposes and to invite you to similar events.

Enable you to register to our on-premises events

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when fill in our registration forms. Sometimes your organisation will send us your personal data to attend our event on your behalf, and we will send you an invitation with the link for registration.

- We handle your personal data in alignment with our legitimate interest in administering and managing the events, for example to contact you with information about an event that you are attending as well for planning and logistics, to invoice you or to provide you customer service in relation to the event, and general administration of your attendance at the event.
- Some time we collaborate with selected partners in personal data processing for organizing events. We disclose personal data to our partners only to the extent necessary for the purposes for which the personal data are processed. In addition, information on dietary restrictions arrangements may be disclosed to a relevant service provider and be disclosed primarily in a format that does not allow the information to be connected to an identifiable person.
- We retain your personal data until the event is completed. However, a participant list that you are part of will be saved for one year in order for us to be able to follow up your participation in the event and invite you to similar events. If events are conducted jointly with a Crayon's partner, the participation list may be shared with that partner for verification purposes and to invite you to similar events.

If you are participating as a speaker or moderator in our video conference, webinar or live broadcast event on-premises events, we may collect and use your information to promote your involvement in the conference through:

- Internal and external corporate communication, including but not limited to publications on Crayon's website and partner websites.
- Use in promotional, marketing, and advertising materials (brochures, newsletters, booklets, social media, press releases, etc.).
- Public presentations, company events, conferences, or other professional gatherings.
- Storage and archiving for historical, educational, and corporate documentation purposes.

Enable us to handle Integrity complaints or claims

- We collect your personal data (name, work email, work phone number and country), complaint or claim and other necessary information in relation to the matter, directly from you when you contact us using the integrity contact form provide in our website, via e-mail or phone.
- We manage your personal data in accordance with our legal obligations and our legitimate interest. This includes receiving, investigating, and resolving any questions, complaints, or claims. We also address any misconduct or other issues reported through our integrity channels.
- We maintain your personal data from the moment the issue is raised, throughout the potential dispute period, and continue to do so for an additional year thereafter.

Enable us to interact via social networks

- We may collect and process name and personal data (email), provided by you on social media connected to us. This can be made through: (I) Direct communication (posting on our

social media channels or direct messaging) (II) Indirect communication (for example, tagging Crayon in your social media posts). Some social media providers provide us with aggregate data relevant for our pages, such as the amount of “likes” triggered by our content or the number of posts, visitors to our sites, or links that are clicked. **When contacting us through a social media platform, we suggest you also familiarise yourself with the privacy information of that platform.**

- We handle your personal data in alignment with our legitimate interest in administering our social media to informing our followers on the corresponding social network of our activities, events, and other related topics, including customer service, through the channels provided by the social network for this purpose. As well as commercial and/or promotional communications that may be of interest to the users.
- We retain your personal data for as long as is necessary to fulfill the purpose for which it was collected, comments and communications with us on social media can be deleted by you at any time. We will remove posts or comments which are in breach of the rules of the platform or in conflict with legislation as soon as possible.

Data Retention

We keep your personal information for no longer than necessary for the purposes for which it is processed. The length of time for which we retain personal information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws as set out in our data retention policy and information handling standards. Generally, this means we retain your personal data to comply with any retention compliance obligations or statutory requirements or for purposes of performing a contract with you. Where there are technical limitations that prevent deletion or anonymization, we safeguard personal information and limit active use of it through implementing appropriate organizational technical and security measures.

Data Sharing

Subject to applicable law, including to the extent applicable law requires us to obtain consent, we may disclose personal information as follows:

- **Crayon Group Entities:** We may disclose your personal data to other entities under common ownership or control with Crayon. These entities use your personal data as described in this Policy. Further information regarding the Crayon Group companies can be obtained here.
- **Service Providers and Advisors:** We may use third party vendors and other service providers to perform services on our behalf. Such services may include marketing campaign services, providing mailing or email services, tax and accounting services, payment processing, conducting surveys, performing customer service, performing data enhancement services, performing fraud prevention services, performing web hosting services or providing analytic services. Any service providers will by appropriate data processing agreements be bound to only process the data on Crayon’s behalf and under its instructions, unless such service providers act as their own controllers (e.g., in the case we seek advice from lawyers and tax consultants).

- **Marketing Partners:** We may provide your personal information to sponsors of events, webinars, or games for which you register, or other parties with whom we may engage in joint marketing activities.
- **Partners:** We may provide your personal data to our partners who supply cloud services to you for the purposes of facilitating licence transactions or services on your behalf where applicable.
- **Purchasers and third parties in connection with a business transaction:** Third parties in connection with a Crayon-related transaction, such as a merger, sale of Crayon assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business, or in the event of a bankruptcy or similar proceedings.
- **Law enforcement, regulators, and other parties for legal reasons:** Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our legal claims or to protect the security or integrity of our Services; and/or (c) to exercise or protect the rights, property or personal safety of Crayon team members, our visitors or others.

Crayon is a truly global organisation so your personal data may be transferred for any of the above stated purposes to different global locations. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

If it is necessary to transfer your personal data from your habitual place of residence to countries that do not offer adequate protections, then we will ensure that appropriate safeguards as required by applicable laws are put in place prior to the transfer of the data. For example by incorporating standard contractual clauses (more information about such clauses is available [here](#)) into contract(s) / data transfer agreement(s) established between the parties transferring the personal data

We may transfer or share your personal data with third parties such as our service providers and vendors, business partners, professional and corporate advisors, public or government authorities including law enforcement, network providers, third party websites, and our affiliates or subsidiaries.

In the event of a merger, reorganization, dissolution or other fundamental corporate change, we may need to disclose your information to a third party in accordance with applicable laws.

Compliance by any third party engaged by Crayon

In the event that any third-party processes personal data on behalf of Crayon, such third party shall:

- Comply with this Policy and Crayon's security policies and standards in addition to any other security controls included within contractual agreements between Crayon and its clients and/or partners.

- Process personal data in accordance with Crayon's documented instructions and for no other purpose than the one expressly defined in writing by Crayon, unless it is required to do so under any mandatory law. In such case, the third party shall inform immediately Crayon of this legal obligation prior to processing.
- Implement and maintain appropriate technical, organizational and contractual measures to ensure appropriate level of protection of personal data and to prevent any unauthorized or unlawful processing of personal data and any accidental loss, destruction or damage to personal data. These measures shall (i) consider the highest standards and the risks posed by the Processing activities, (ii) be designed to implement the data protection principles in an effective manner and provide the processing activities with the necessary safeguards in order to meet the requirements of the Applicable Data Protection Legislation.
- Notify, to the extent permitted by law, Crayon of any request for disclosure of Crayon's personal data that it receives from a third party, public authority or court, as well as of any action and/or measure regarding the processing of Crayon's personal data that is under investigation by the authorities.
- Comply with any request from Crayon for access, rectification, blocking, restoration, deletion and objection of Crayon's personal data and ensure portability and the right to be forgotten of Crayon's personal data.
- Notify Crayon immediately of any changes that may affect the processing of Crayon's personal data.
- Actively cooperate with Crayon to assess and document the compliance of Crayon's personal data processing, including providing Crayon with any information that Crayon may need or require to comply with Applicable Data Protection Legislation (including any information required for the Transfer Impact Assessment (TIA)).
- Immediately inform Crayon in writing if, in its opinion, any instruction from Crayon regarding the Processing of Crayon's personal data constitutes a violation of the Applicable Data Protection Legislation.

Your Choices

This section describes many of the actions you can take to change or limit the collection, use, storage, or other processing of your personal information.

- **Marketing Messages:** You can opt out of email marketing messages we send you by clicking on the "unsubscribe" link in the email message. Alternatively, you can send us a brief email to: Opt-Out@Crayon.com if you have engaged in transactions with us, we may continue to send transactional or relationship messages (e.g., signing notifications or account notifications) after you opt out of marketing messages. If you would like your phone number added to our internal Do-Not-Call list to opt out of telemarketing messages, let us know at any time, including during a telemarketing call, that you do not want to be called again for telemarketing purposes.
- **Cookies and Other Related Technology.** You can decline cookies through your browser settings or via the Crayon Cookie Preference Center. However, if you decline cookies, you may not be able to use some parts of our Services. Please note we do not recognize or respond to browser initiated Do Not Track signals.

- **Device and Usage Information.** If you do not want us to see your device location, you can turn off location sharing on your device, change your device privacy settings, or decline to share location on your browser.

Data Subject Rights

The rights available to you depend on our reason for processing your personal data:

- **Right to Information:** obtain information about the personal data processing by us, in addition to that information already provided by us through its privacy policy.
- **Right of Access:** get confirmation whether we are processing your personal data and, if so, get a description and copy of that data.
- **Right to Rectification:** get a rectification of any inaccuracies of your personal data which we are processing.
- **Right to Erasure, to Restrict and to Object:** ask us to erase or stop or restrict the processing of your personal data.
- **Right to Data Portability:** obtain a copy of your personal data transmitted by us to another data controller in a structured, commonly used, and machine-readable format.

Where Crayon acts as the Data Processor and receives a request from an individual to exercise, they right, we will transfer such request promptly to the data controller unless otherwise indicated in any contractual agreement. We shall not be required to inform data subjects directly thereof, as this remains the responsibility of the data controller.

In any case, you will receive a response within one month of your request. This period may be extended by up to two more months if needed. Please note that the requested information is free of charge.

Please contact Crayon's Data Protection Officer if you wish to exercise your privacy rights:

[Contact Crayon's DPO](#)

Your right to object

If you no longer wish to receive marketing communications from us, you can unsubscribe by clicking the unsubscribe link in our email communications. Alternatively, you can send us a brief email to: Opt-Out@Crayon.com. If you object to receiving communications from us, we keep track of this in our "unsubscribe-list" to avoid sending you any further communications.

Your right to submit a complaint

If you are concerned that a data processing activity associated with Crayon may have infringed your data privacy rights or the European Union General Data Protection Regulation or any other applicable law, please submit our privacy complaint form to: DPO@Crayon.com.

[Download our Privacy Complaint Form](#)

Your right to complaint with a supervisory authority

If you remain dissatisfied, you can make a complaint about the way we process your personal data with the relevant data supervisory authority of the country in which you reside or work or where the alleged breach has occurred.

Automated decision making

Crayon does not carry out automated decision-making processes, including profiling, unless you have explicitly authorized us to do so. In that case, we would inform you about the logic used in the decision and the meaning and expected consequences of such processing to you.

South Africa PAIA Manual

In compliance with Section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), and aligned with the Protection of Personal Information Act, 4 of 2013 ("POPIA"), Crayon has prepared its PAIA Manual to guide individuals seeking access to company records. This Manual outlines the procedures for submitting access requests, includes the official PAIA Request Form, and provides detailed information about the application process.

View or download the Crayon PAIA Manual here:

[Crayon PAIA Manual](#)

1.1.3.5 Customer Employees

This Data Privacy Policy explains how we collect and use personal data in a number of different situations.

The information in this policy is important, so we have tried to make it very easy to navigate. Use the links to locate the sections that are relevant to you. These will help you find out more about how we collect, use and share personal information in our relationship or interaction with you.

We use your personal data to administer and manage the relationship between us and the entity you represent or are employed by, which is a customer, prospective customer, partner or supplier or contact of Crayon Systems.

Enable communication

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role. We collect your personal data directly from you when you liaise with us on behalf of our customers or contacts (including prospective customers) or may come from the relevant customer or contact, your employer, other customers, suppliers and other business partners.
- We handle your personal data in alignment with our legitimate interest in conducting our business operations. This includes creating or maintaining a business relationship with you or the entity that you represent.

Enable marketing and communications

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you liaise with us on behalf of our customers or contacts (including prospective customers) or may come from the relevant customer or contact, your employer, other customers, suppliers and other business partners or from publicly available sources in this case we tailor our marketing communications based on industry, job title and preferences. As a result of this activity, you will receive tailored marketing material relating to your industry or selected interest areas.
- We handle your personal data in alignment with our legitimate interest in administering and managing our marketing and promotional communications about our services relevant to your organization, to manage our communications which you have expressed interest in to measure the effectiveness of our marketing campaigns and develop our marketing and sales strategy.
- When we process your personal data during a telephone conversation with us, you will be informed in advance if your conversation is going to be recorded. We will also explain the reasons for this recording. This applies to both outgoing and incoming calls. In addition to this, we collect the recording of the conversation. The primary purpose of these recordings is to ensure that you receive a high-quality service, as they are used for training and/or verification purposes

Opt-out

- If you no longer wish to receive marketing communications from us, you can unsubscribe by clicking the unsubscribe link in our email communications. Alternatively, you can send us a brief email to: Opt-Out@Crayon.com

Enable registration to our video conference, webinar or live broadcast event

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you liaise with us on behalf of our customers or contacts (including prospective customers), or at customer request.
- We handle your personal data in alignment with our legitimate interest in administering and managing the registration process, organization and sending you update information with

the event details. We record some events, and all presenters will have their image and audio captured in the recording. If you are an attendee, you may have the option of sharing your image and audio during the session. If you choose to do so, this will also be captured in the recording. For recorded events we will also email you a link to the recording once the event has concluded.

- We retain your personal data until the event is completed. However, a participant list that you are part of, will be saved for one year in order for us to be able to follow up your participation in the event and invite you to similar events. If events are conducted jointly with a Crayon's partner, the participation list may be shared with that partner for verification purposes and to invite you to similar events.

Enable registration to our on-premises events

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you liaise with us on behalf of our customers or contacts (including prospective customers), or at customer request.
- We handle your personal data in alignment with our legitimate interest in administering and managing the event, including confirmations, updates, and possible changes, cancellation or general administration of your attendance at the event.
- There may be times we collaborate with selected partners in personal data processing for organizing or conducting events. We disclose personal data to our partners only to the extent necessary for the purposes for which the personal data are processed. In addition, information on dietary restrictions arrangements may be disclosed to a relevant service provider and be disclosed primarily in a format that does not allow the information to be connected to an identifiable person.
- We retain your personal data until the event is completed. However, a participant list that you are part of will be saved for one year in order for us to be able to follow up your participation in the event and invite you to similar events. If events are conducted jointly with a Crayon's partner, the participation list may be shared with that partner for verification purposes and to invite you to similar events.

Enable access to our portals

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you liaise with us with us on behalf of the entity you represent or are employed by.
- We process your personal data for the purposes of enable customer employee to login to our various web portals such as Cloud-iQ, Core-iQ and Service-iQ or similar web portals. In instances where such web portals process personal data that goes beyond basic contact information used for application authentication purposes, such web portals will contain their own Privacy Policy explaining why and how personal data is collected and processed by those applications. We encourage individuals using our web portals to refer to the Privacy Policy available on those applications.

Enable Surveys

- We collect your personal data (name, work email, work phone number), as well as your company's name, and your business role, we collect your personal data directly from you when you liaise with us on behalf of the entity you represent or are employed by.
- We handle your personal data in alignment with our legitimate interest in administering and managing the surveys and gather feedback on our products and services. This feedback helps us improve based on users' practical experience and needs. Additionally, for Customer Voice, we allow customers to provide additional details and specify their preferred contact method in case any necessary actions need to be taken.

Opt-out

- If you no longer wish to receive marketing communications from us, you can unsubscribe by clicking the unsubscribe link in our email communications.

Data Retention

We keep your personal information for no longer than necessary for the purposes for which it is processed. The length of time for which we retain personal information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws as set out in our data retention policy and information handling standards. Generally, this means we retain your personal data to comply with any retention compliance obligations or statutory requirements or for purposes of performing a contract with you. Where there are technical limitations that prevent deletion or anonymization, we safeguard personal information and limit active use of it through implementing appropriate organizational technical and security measures.

Data Sharing

Subject to applicable law, including to the extent applicable law requires us to obtain consent, we may disclose personal information as follows:

- **Crayon Group Entities:** We may disclose your personal data to other entities under common ownership or control with Crayon. These entities use your personal data as described in this Policy. Further information regarding the Crayon Group companies can be obtained here.
- **Service Providers and Advisors:** We may use third party vendors and other service providers to perform services on our behalf. Such services may include marketing campaign services, providing mailing or email services, tax and accounting services, payment processing, conducting surveys, performing customer service, performing data enhancement services, performing fraud prevention services, performing web hosting services or providing analytic services. Any service providers will by appropriate data processing agreements be bound to only process the data on Crayon's behalf and under its instructions, unless such service providers act as their own controllers (e.g., in the case we seek advice from lawyers and tax consultants).
- **Marketing Partners:** We may provide your personal information to sponsors of events, webinars, or games for which you register, or other parties with whom we may engage in joint marketing activities.

- **Partners:** We may provide your personal data to our partners who supply cloud services to you for the purposes of facilitating licence transactions or services on your behalf where applicable.
- **Purchasers and third parties in connection with a business transaction:** Third parties in connection with a Crayon-related transaction, such as a merger, sale of Crayon assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business, or in the event of a bankruptcy or similar proceedings.
- **Law enforcement, regulators, and other parties for legal reasons:** Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our legal claims or to protect the security or integrity of our Services; and/or (c) to exercise or protect the rights, property or personal safety of Crayon team members, our visitors or others.

Crayon is a truly global organisation so your personal data may be transferred for any of the above stated purposes to different global locations. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

If it is necessary to transfer your personal data from your habitual place of residence to countries that do not offer adequate protections, then we will ensure that appropriate safeguards as required by applicable laws are put in place prior to the transfer of the data. For example by incorporating standard contractual clauses (more information about such clauses is available [here](#)) into contract(s) / data transfer agreement(s) established between the parties transferring the personal data

We may transfer or share your personal data with third parties such as our service providers and vendors, business partners, professional and corporate advisors, public or government authorities including law enforcement, network providers, third party websites, and our affiliates or subsidiaries.

In the event of a merger, reorganization, dissolution or other fundamental corporate change, we may need to disclose your information to a third party in accordance with applicable laws.

Compliance by any third party engaged by Crayon

In the event that any third-party processes personal data on behalf of Crayon, such third party shall:

- Comply with this Policy and Crayon's security policies and standards in addition to any other security controls included within contractual agreements between Crayon and its clients and/or partners.
- Process personal data in accordance with Crayon's documented instructions and for no other purpose than the one expressly defined in writing by Crayon, unless it is required to do so under any mandatory law. In such case, the third party shall inform immediately Crayon of this legal obligation prior to processing.

- Implement and maintain appropriate technical, organizational and contractual measures to ensure appropriate level of protection of personal data and to prevent any unauthorized or unlawful processing of personal data and any accidental loss, destruction or damage to personal data. These measures shall (i) consider the highest standards and the risks posed by the Processing activities, (ii) be designed to implement the data protection principles in an effective manner and provide the processing activities with the necessary safeguards in order to meet the requirements of the Applicable Data Protection Legislation.
- Notify, to the extent permitted by law, Crayon of any request for disclosure of Crayon's personal data that it receives from a third party, public authority or court, as well as of any action and/or measure regarding the processing of Crayon's personal data that is under investigation by the authorities.
- Comply with any request from Crayon for access, rectification, blocking, restoration, deletion and objection of Crayon's personal data and ensure portability and the right to be forgotten of Crayon's personal data.
- Notify Crayon immediately of any changes that may affect the processing of Crayon's personal data.
- Actively cooperate with Crayon to assess and document the compliance of Crayon's personal data processing, including providing Crayon with any information that Crayon may need or require to comply with Applicable Data Protection Legislation (including any information required for the Transfer Impact Assessment (TIA)).
- Immediately inform Crayon in writing if, in its opinion, any instruction from Crayon regarding the Processing of Crayon's personal data constitutes a violation of the Applicable Data Protection Legislation.

Your Choices

This section describes many of the actions you can take to change or limit the collection, use, storage, or other processing of your personal information.

- **Marketing Messages:** You can opt out of email marketing messages we send you by clicking on the "unsubscribe" link in the email message. Alternatively, you can send us a brief email to: Opt-Out@Crayon.com if you have engaged in transactions with us, we may continue to send transactional or relationship messages (e.g., signing notifications or account notifications) after you opt out of marketing messages. If you would like your phone number added to our internal Do-Not-Call list to opt out of telemarketing messages, let us know at any time, including during a telemarketing call, that you do not want to be called again for telemarketing purposes.
- **Cookies and Other Related Technology.** You can decline cookies through your browser settings or via the Crayon Cookie Preference Center. However, if you decline cookies, you may not be able to use some parts of our Services. Please note we do not recognize or respond to browser initiated Do Not Track signals.
- **Device and Usage Information.** If you do not want us to see your device location, you can turn off location sharing on your device, change your device privacy settings, or decline to share location on your browser.

Data Subject Rights

The rights available to you depend on our reason for processing your personal data:

- Right to Information: obtain information about the personal data processing by us, in addition to that information already provided by us through its privacy policy.
- Right of Access: get confirmation whether we are processing your personal data and, if so, get a description and copy of that data.
- Right to Rectification: get a rectification of any inaccuracies of your personal data which we are processing.
- Right to Erasure, to Restrict and to Object: ask us to erase or stop or restrict the processing of your personal data.
- Right to Data Portability: obtain a copy of your personal data transmitted by us to another data controller in a structured, commonly used, and machine-readable format.

Where Crayon acts as the Data Processor and receives a request from an individual to exercise, they right, we will transfer such request promptly to the data controller unless otherwise indicated in any contractual agreement. We shall not be required to inform data subjects directly thereof, as this remains the responsibility of the data controller.

In any case, you will receive a response within one month of your request. This period may be extended by up to two more months if needed. Please note that the requested information is free of charge.

Please contact Crayon's Data Protection Officer if you wish to exercise your privacy rights:

[Contact Crayon's DPO](#)

Your right to object

If you no longer wish to receive marketing communications from us, you can unsubscribe by clicking the unsubscribe link in our email communications. Alternatively, you can send us a brief email to: Opt-Out@Crayon.com. If you object to receiving communications from us, we keep track of this in our "unsubscribe-list" to avoid sending you any further communications.

Your right to submit a complaint

If you are concerned that a data processing activity associated with Crayon may have infringed your data privacy rights or the European Union General Data Protection Regulation or any other applicable law, please submit our privacy complaint form to: DPO@Crayon.com.

[Download our Privacy Complaint Form](#)

Your right to complaint with a supervisory authority

If you remain dissatisfied, you can make a complaint about the way we process your personal data with the relevant data supervisory authority of the country in which you reside or work or where the alleged breach has occurred.

Automated decision making

Crayon does not carry out automated decision-making processes, including profiling, unless you have explicitly authorized us to do so. In that case, we would inform you about the logic used in the decision and the meaning and expected consequences of such processing to you.

1.1.3.6 Partner & Supplier Employees

How we champion human rights and data protection to earn the trust of our partner's and supplier's employees.

1.1.3.6.1 Human Rights

The fundamental principles of individual dignity and the protection of human rights serve as the foundation for the conduct we expect from every person associated with our organization. This encompasses both direct employees of Crayon and team members employed within our supply chain.

At Crayon, fostering a work environment that promotes respect for our customer's employees is of utmost importance to us. We are committed to upholding internationally recognized human rights across all aspects of our operations, and we expect the same level of commitment from our partners and suppliers.

For more details on Human rights, Health and safety (HSE), Diversity, Equity and Inclusion (DEI), please refer to Crayon's ESG 2024 report.

[Download Crayon's ESG Report](#)

1.1.3.6.2 Data Protection

While we are committed to collaborating with our partners and suppliers in delivering IT service excellence to our customers, we respect every individual's right to privacy whenever we process the personal data of our partner's or supplier's employees.

Whenever we process personal data of partner or supplier employees as an independent data controller, we rely on the lawful basis of legitimate interest to:

- Collect personal data which includes your name and contact details (work email, work phone number, country), as well as your company's name and your business role provide by you or your employer or public sites e.g. your company website.
- For some specific suppliers, such as consultants, external contractors, we may also collect additionally personal information (date of birth, nationality, pictures); professional and employment information (education and training); any other data which we process in the context of our business relationship as per the specific applicable contract terms.
- Process your personal data for the purposes of prequalification and tendering to evaluate and select your business as a supplier when we need to put out tenders for goods or services.
- Process your personal data for the purposes of Contract management when we have entered into a contract with a supplier and to follow-up on and manage our suppliers' performance.
- Process your personal data for the purposes of administration of business relationships including communication (emails), when sending purchase orders and conclusion of commercial agreements, and in connection with invoicing, accounting etc. in connection with financial statements.

Securing personal data is an important aspect of protecting privacy. We take reasonable and appropriate physical, technical and organizational security measures in accordance with applicable laws to protect your personal data against the risk of accidental loss, compromise or any form of unauthorized access, disclosure or processing. Our security approach includes:

- **Technical Measures:** We implement and use information security standards, protocols and technologies, including encryption, intrusion detection and data loss prevention, and we monitor our systems and data centers to comply with our security policies.
- **Organizational Measures:** We conduct regular company-wide as well as role-specific training and awareness programs on security and privacy. Aside from our global Secured Productivity Policy, we provide team members with role-based instructions.
- **Physical Protection:** We lock doors and file cabinets, control access to our facilities, implement a clean desk policy and apply secure destruction processes to media containing personal data.

If you have any questions about the security of your personal data or the security of the site, or wish to report a potential security issue, please contact us without hesitation:

Report a Security or Privacy Event

We do not carry out automated decision-making processes.

All transfers of personal data within Crayon are performed in accordance with the applicable data protection legislation and in accordance with Crayons' Binding Corporate Rules (BCR). This means that your rights as data subject remain the same no matter where your personal data is processed.

Any transfers of personal data to third parties are performed in accordance with the applicable data protection legislation, and we conduct due diligence on third parties to establish their maturity with respect to security and data protection.

In relation to the processing of your personal data, you have the following privacy rights:

- Right to information: get information about the personal data processed by us.
- Right of access: get confirmation whether we are processing your personal data.
- Right to rectification: get a rectification of any inaccuracies with your personal data.
- Right to erasure, to restrict and to object: get us to erase or stop or restrict the processing of your personal data.
- Right to data portability: get a copy of your personal data in a commonly used, and machine-readable format.

Please contact Crayon's Data Protection Officer if you wish to exercise your privacy rights:

Contact Crayon's DPO

1.1.3.7 Updates

We review and update our Privacy Policy from time to time to keep it clear, accurate, and aligned with legal, technical, and business developments. The latest version is always available at [Welcome to our Trust Center - Crayon](#), with the date showing when it was last updated. If any changes could affect your rights, we will provide advance notice. General updates will also be communicated in the footer of our outgoing emails.

Last Updated: 16 April 2025

1.1.3.8 Historical

WEB VISITORS

How we protect personal data to earn the trust of our website visitors.

1.1.3.8.1 Data Protection

While we are committed to communicate or interact with you via our Website e.g., download material, subscribe to our newsletters, take part in a promotion campaign or give us feedback, we respect every individual's right to privacy and are committed to honoring our obligations as a data controller, whenever we process the personal data of those individuals visiting our website.

Whenever you visit one of our websites without having a business relationship, e.g., by contacting us through our contact forms on our website or by sending us an e-mail or a message at our social media account, we rely on the lawful basis of legitimate interest:

- To send newsletters and marketing communications or to contact you by telephone, we collect your name and contact details (work email) directly from you, or received from third-party data providers, subject to controls confirming that the third party legally acquired the information and has the right to provide the information to us for use in our marketing communications. We also collect IP-address statistics around email opening and clicks using industry standard technologies to help us monitor and improve our newsletter and marketing communications.

Process your personal data for the purposes of provide you with newsletter, marketing material and to manage analytics information so we can provide a personalized service, monitor the impact of our work and improve our communication strategies.

Retain your personal data up to you choose to unsubscribe to receiving newsletters and marketing at any time using the unsubscribe link provided in the email or by sending a short email to opt-out@crayon.com. If you object to receiving marketing from us, we keep track of this in our "unsubscribe-list" to avoid sending you any further marketing material.

- To contact us we collect your name and contact details (work email, work phone number, country), as well as your company's name, and your business role, directly from you when you contact us using the contact form provide in our website or via e-mail.

Process your personal data for the purposes of responding to your request depending on the country and service within the scope to further align our business processes with the needs of visitors to the website.

Retain your personal data from the time the matter was initiated an for the duration to resolution of your request.

- To arrange webinars and live broadcast event, we collect your name and contact details (work email, work phone number, country), as well as your company's name, and your business role directly from you when you fill in our registration forms, or sometimes your organisation will send us your contact details to attend our event on your behalf.

Process your personal data for the purposes of sending you update information to provide you with the event details. This will include information about any recording taking place. For recorded events we will also email you a link to the recording once the event has concluded

Retain your personal data will be stored until the event is completed. However, a participant list that you are part of will be saved for one year in order for us to be able to follow up your participation in the event and invite you to similar events.

- To arrange event, seminar or workshop on-premises, we collect your name and contact details (work email, work phone number, country), as well as your company's name, and your business role, when you fill in our registration forms. Sometimes your organisation will send us your contact details to attend our event on your behalf, and we will send you an invitation with the link for registration

Process your personal data for the purposes of general administration and organisation of our events, for example to contact you with information about an event that you are attending as well for planning and logistics, to invoice you or to provide you customer service in relation to the event, and general administration of your attendance at the event

Retain your personal data will be stored until the event is completed. However, a participant list that you are part of will be saved for one year in order for us to be able to follow up your participation in the event and invite you to similar events.

- To handle any questions or complaints we collect your name and contact details (work email, work phone number, country), complaint or claim and other necessary information in relation to the matter, directly from you when you contact us using the contact form provide in our website or via e-mail.

Process your personal data for the purposes of receiving, investigate and resolve any questions, complaints or claims, misconduct or other matters reported through our integrity channels.

Retain your personal data from the time the matter was initiated and for the duration of the potential dispute.

- To interact via social networks, we may collect and process name and contact details (email), provided by you on social media connected to us. This can be made through: (I) Direct communication (posting on our social media channels or direct messaging) (II) Indirect communication (for example, tagging Crayon in your social media posts). Some social media providers provide us with aggregate data relevant for our pages, such as the amount of "likes" triggered by our content or the amount of posts, visitors to our sites, or links that are clicked

Process your personal data for the purposes of informing our followers on the corresponding social network of our activities, events, and other related topics, including customer service, through the channels provided by the social network for this purpose. As well as commercial and/or promotional communications that may be of interest to the users.

Retain your personal data including comments and communications with us on social media can be deleted by you at any time. We will remove posts or comments which are in breach of the rules of the platform or in conflict with legislation as soon as possible.

By default, we do not collect special categories data from website visitors. special categories of personal data refer to information relating to race or ethnic origin, political opinions, religious or philosophical beliefs or other beliefs of a similar nature, trade union membership, genetic data, biometric data for the sole purpose of identifying a natural person, health data, sex life or sexual orientation.

CUSTOMER EMPLOYEES

How we champion human rights and data protection to earn the trust of our customer's employees.

1.1.3.8.2 Human Rights

The fundamental principles of individual dignity and the protection of human rights serve as the foundation for the conduct we expect from every person associated with our organization. This encompasses both direct employees of Crayon and team members employed within our supply chain.

At Crayon, fostering a work environment that promotes respect for our customer's employees is of utmost importance to us. We are committed to upholding internationally recognized human rights across all aspects of our operations, and we expect the same level of commitment from our partners and suppliers.

For more details on Human rights, Health and safety (HSE), Diversity, Equity and Inclusion (DEI), please refer to Crayon's ESG 2024 report.

[Download Crayon's ESG Report](#)

1.1.3.8.3 Data Protection

While we are committed to providing our customers with IT service excellence, we respect every individual's right to privacy whenever we process the personal data of our customer's employees.

Whenever we process personal data of customer employees as an independent data controller, we rely on the lawful basis of legitimate interest to:

- Collect your personal data name and contact details (work email, work phone number, country), as well as your company's name, and your business role.
- Process your personal data that we have either provided voluntarily by you; at customer request or collected by us from third-party sources such as from business partners.
- Process your personal data for the purposes of communicate in accordance with the agreement or interaction before a possible agreement, creating or maintaining a business relationship or to contact you to create a business relationship with you or the company that you represent. In other words, contact information is used for interaction and communication.
- Process your personal data for the purposes of enable customer employee to login to our various web portals such as Cloud-iQ, Optima-iQ, Core-iQ and Service-iQ. In instances where such web portals process personal data that goes beyond basic contact information used for application authentication purposes, such web portals will contain their own privacy notices explaining why and how personal data is collected and processed by those applications. We encourage individuals using our web portals to refer to the privacy notices available on those applications.
- Process your personal data to provide you with marketing and promotional communications about our services relevant to your organization, to manage our communications which you have expressed interest (direct marketing) to measure the effectiveness of our marketing campaigns and develop our marketing strategy.
- Process your personal data to enable your registration process and organization for the video conference, webinar or live broadcast event. We record some events and all presenters will have their image and audio captured in the recording. If you are an attendee, you may have the option of sharing your image and audio during the session. If you choose to do so, this will also be captured in the recording.
- Process your personal data to attend our event, sometimes your organisation will send us your contact details to attend our event on your behalf, and we will send you an invitation with the link for registration, we will send you information, including confirmations, updates, and possible changes, cancellation or general administration of your attendance at the event.
- Process your personal data to manage the survey and to obtain your feedback of our products and services to improve them based on users' practical experience and needs.
- Retain your personal data for the period necessary to comply with the purposes defined in this Privacy Policy and in compliance with applicable legislation.

Securing personal data is an important aspect of protecting privacy. We take reasonable and appropriate physical, technical and organizational security measures in accordance with applicable laws to protect your personal data against the risk of accidental loss, compromise or any form of unauthorized access, disclosure or processing. Our security approach includes:

- **Technical Measures:** We implement and use information security standards, protocols and technologies, including encryption, intrusion detection and data loss prevention, and we monitor our systems and data centers to comply with our security policies.
- **Organizational Measures:** We conduct regular company-wide as well as role-specific training and awareness programs on security and privacy. Aside from our global Secured Productivity Policy, we provide team members with role-based instructions.
- **Physical Protection:** We lock doors and file cabinets, control access to our facilities, implement a clean desk policy and apply secure destruction processes to media containing personal data.

If you have any questions about the security of your personal data or the security of the site, or wish to report a potential security issue, please contact us without hesitation:

[Report a Security or Privacy Event](#)

We do not carry out automated decision-making processes.

All transfers of personal data within Crayon are performed in accordance with the applicable data protection legislation and in accordance with Crayons' Binding Corporate Rules (BCR). This means that your rights as data subject remain the same no matter where your personal data is processed.

Any transfers of personal data to third parties are performed in accordance with the applicable data protection legislation, and we conduct due diligence on third parties to establish their maturity with respect to security and data protection.

Whenever we contact you for marketing purposes, you can proactively manage your preferences or opt-out of communications (unsubscribe) at any time using the unsubscribe link provided in the email marketing communications or by sending a short email to opt-out@crayon.com. If you object to receiving marketing from us, we keep track of this in our "unsubscribe-list" to avoid sending you any further marketing material.

In relation to the processing of your personal data, you have the following privacy rights:

- **Right to information:** get information about the personal data processed by us.
- **Right of access:** get confirmation whether we are processing your personal data.

- Right to rectification: get a rectification of any inaccuracies with your personal data.
- Right to erasure, to restrict and to object: get us to erase or stop or restrict the processing of your personal data.
- Right to data portability: get a copy of your personal data in a commonly used, and machine-readable format.

Please contact Crayon's Data Protection Officer if you wish to exercise your privacy rights:

[Contact Crayon's DPO](#)

JOB APPLICANTS

How we champion human rights and data protection to earn our applicant's trust.

1.1.3.8.4 Human Rights

The fundamental principles of individual dignity and the protection of human rights serve as the foundation for the conduct we expect from every Crayon team member and job applicant.

At Crayon, fostering a work environment that promotes encouragement, motivation, and respect for every team member, job applicant, and customer employee is of utmost importance to us. We are committed to upholding internationally recognized human rights across all aspects of our operations, and we expect the same level of commitment from our new team members.

Furthermore, we promise to protect our employees' right to collective bargaining and freedom of association, while actively working towards eliminating forced labour, child labour, and employment discrimination. These commitments reflect our unwavering commitment to human rights and our responsibility to create a fair and inclusive working environment for all.

For more details on human rights, health and safety, Diversity, Equity and Inclusion (DEI), please refer to Crayon's ESG 2024 report.

[Download Crayon's ESG Report](#)

1.1.3.8.5 Data Protection

While we are committed to assessing your suitability for employment opportunities with us, we respect your right to privacy and are committed to honoring our obligations as a data controller, whenever we process your personal data during the talent acquisition process.

Whenever you apply for a job with us around the world, we rely on the lawful basis of necessity for the performance of a contract to which you are a party, or legitimate interest to:

- Collect personal data which includes your name and contact details (email and phone number), copy of your CV or resume and any information you may provide to us during the recruitment processes.

The personal data that we process is collected from a variety of sources as follows:

- When you provide us with your personal data, through forms that you fill out and resume or curriculum (CVs), in a file format or link of professional social media websites (such as LinkedIn), that you send us when you apply for any recruitment process published on LinkedIn, on our website or via email, in person or other means that lead you to our recruitment platform.
- When we receive your personal data from our team members, through the indication of our team member who recommend your profile to us so that we can make contact to invite you to participate in any of our recruitment and selection processes or even to schedule an interview.
- When you have chosen to make your personal data public, through consultations on the internet mainly on LinkedIn, we may collect publicly available data about you to invite you to participate in our recruitment and selection process for a vacancy related to your profile or even to learn more about your professional profile and proceed with your selection process.
- When we receive your personal data from references, we may obtain information about your background and professional characteristics by contacting any professional reference you have referred to us or identified as important for obtaining references about you.

By default, we do not collect sensitive personal data during the recruitment and selection process. However, we can collect sensitive personal data about you to the extent permitted by applicable laws (e.g., equal opportunity laws) and to support our efforts to create an inclusive and diverse work environment. All our data processing, especially when involving sensitive personal data, respect the principles of transparency and non-discrimination.

Purpose

- Process your personal data for the purposes to conduct the recruitment and selection process, review and assess qualifications to determine eligibility for position, communicate and respond to inquiries regarding employment opportunities and applications, organize interviews, and send updates on recruitment opportunities.
- If you are approved at all stages of the recruitment and selection process and receive our offer letter, depending on your position or activity to be developed at Crayon, other data about you may be collected for background check. If a background check is required, it will take place to the extent permitted by law, and you may be contacted by us to provide authorization for the release of your information. At that time, you will be provided with further information about the process and what personal data it might involve.
- As otherwise required or permitted by law (e.g., in connection with legal claims, to protect the legal rights, safety or security of Crayon or others, or to otherwise process in connection with compliance, regulatory, auditing/reporting and investigative purposes).

Data Retention

If you are given and accept an offer of employment by us, the personal data collected during your pre-employment period may become part of your employment record on personnel records file, to be retained throughout and for a period of time after your employment with us (specific periods vary by country).

If we do not employ you, we will retain your personal data according to the document retention policy after which your personal information will be erased from the Recruitment systems.

Securing personal data is an important aspect of protecting privacy. We take reasonable and appropriate physical, technical and organizational security measures in accordance with applicable laws to protect your personal data against the risk of accidental loss, compromise or any form of unauthorized access, disclosure or processing. Our security approach includes:

- **Technical Measures:** We implement and use information security standards, protocols and technologies, including encryption, intrusion detection and data loss prevention, and we monitor our systems and data centers to comply with our security policies.
- **Organizational Measures:** We conduct regular company-wide as well as role-specific training and awareness programs on security and privacy. Aside from our global Secured Productivity Policy, we provide team members with role-based instructions.
- **Physical Protection:** We lock doors and file cabinets, control access to our facilities, implement a clean desk policy and apply secure destruction processes to media containing personal data.

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- Right to information: get information about the personal data processed by us.
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