



# Web Privacy Policy

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## Introduction

### Please read carefully.

Pyramid Consulting, Inc. (USA), Pyramid Consulting, Inc. (Canada), Pyramid IT Consulting Pvt. Ltd. (India), and its subsidiaries (Singapore, UK, Mexico), affiliated divisions — Celsior®, GenSpark®, Celsior Pvt. (India), Pyramid Systech Pvt. (India), The Pyramid Organizations, Inc., and its subsidiaries (UK, Ireland), Pyramid Dynamics, S. de R.L. de C.V (Mexico) together with its subsidiaries, (collectively, “Pyramid”, “we”, “us” or “our”), recognize the importance of protecting your privacy. Our web privacy and cookie policy applies to your use of our public websites, as well as your personal and professional interactions with Pyramid employees. This policy is designed to how we collect, process, safeguard, and disclose your personal information and your choices in making informed decisions when using the site. We also describe how you can contact us about our privacy practices.



# Our Web Privacy Policy

## Your acceptance through express consent

This web privacy policy describes how Pyramid collects, uses, and discloses certain personal information obtained through this site and other Pyramid Consulting, Inc. business activity. This privacy policy is incorporated into, and is part of, the terms and conditions that govern your use of Pyramid Consulting Inc.'s properties, services, amenities, and this site in general.

## The types of information we collect

The types of personal information we may collect from you, or you may choose to provide include:

- Contact information
- First name / last name
- Email
- Phone
- Job class
- Job type
- Advertising / discovery source
- Any additional notes they choose to provide
- Online identifiers attached to your device or account
- Information about your use of our websites
- Your social media interactions with us (for example, when you “like” a post on social media platforms)
- Technical information from advertisements we place on third-party websites (such as your IP address, browser type and version, device identifiers, location, and time zone setting)

## How we use your information?

### Our communications to you — Offerings where you expressed interest

When you visit our site, you may be required to register with us or be requested to provide us with personal information. When you provide us with this information, we may use it to contact you about the opportunities in which you have expressed an interest. Pyramid has a legitimate business interest to use the personal information we collect from you to provide such requested information. Where we have relied on your express consent, however, if you tell us that you do not want us to use this information as a basis for further contact with you (by contacting us and requesting our opt-out process), we will comply within 24 hours.



### **Our communications to you — Events, newsletters, and marketing:**

To keep our candidates informed about our latest news, communities, and events, we may send texts, emails, and marketing communications to the phone numbers or email addresses provided to us while registering on our site or requesting information from us. Pyramid complies with applicable laws when using your personal information for this purpose and where applicable relies on your express consent. If you opt-in for any of our email lists, newsletters, or other promotional offerings and later change your mind, you may unsubscribe by following the instructions contained in each email we send you.

### **General business uses**

We may also use the personal information we obtain about you for the following purposes:

- Evaluating and improving our business reach – including decisions about where to develop new communities, the amenities needed and pricing.
- Improving our business processes.
- Candidate satisfaction surveys.
- Enforcing our other legal rights.

### **Information provided to us about you by third parties**

#### **Third-party content:**

We may present or embed content on our site, such as resumes, that is provided by our third-party vendors. This content may contain links to other sites not operated by Pyramid or may request personal information. For example, this content may ask for an email address to subscribe to alerts or share a listing with a friend. This information is collected by our vendors and not by us. In some cases, these vendors may share the personal information they collect from you with us. We share and are co-responsible for the privacy practices of our vendors. We encourage you to review their privacy policies to understand how they will use and share the personal information you provide to them.

#### **Third-party usage:**

You may also separately share your information with other websites or entities, such as those that create professional marketing lists, to receive special offers and promotions from their affiliates. These websites or entities may share your information with us. Pyramid is co-responsible for shared data between us and our partners. We do our best to collect your consent from our partners and will not use your data if consent has not been collected and shared legally.

#### **Marketing data:**

Where applicable law allows, we will purchase marketing data from third parties and add it to our existing user database to better target our advertising and to provide pertinent offers in which we think you would be



interested. We may also associate this marketing data with the personally identifiable information that you provide us. In all cases, we will collect the data source and your consent records from these partners.

### **Third parties with whom we share your personal information**

#### **Third parties for retargeting advertising:**

We will, in some cases, share information about how you use our site with third-party vendors to present you with more relevant advertising. For example, our vendors may track your browsing activity on our site using cookies to show you ads based on your interests when you browse the web or use social media. Our vendors will, in some cases, also share information about your browsing activity on our site with us for analytics purposes. Pyramid relies on your express consent for such processing of your personal information. More information on these cookies, including how to provide or revoke your consent, may be found in our cookie policy below.

#### **Service providers:**

We may share your personal information with companies acting as our authorized agents in providing our services, including the following categories of service providers:

- Infrastructure and IT service providers, including cloud service providers.
- Marketing, advertising, and communications agencies.
- External auditors and advisors.
- Utility companies.
- Construction service supplies such as painting contractors.
- Candidate service providers such as pest control and appliance repair.
- Cookie analytics providers.
- Online advertisers.
- Providers of website testing / analytics services.

Each service provider must agree to implement and maintain reasonable security procedures and practices appropriate to the nature of your information in order to protect your personal information from unauthorized access, destruction, use, modification, or disclosure. Because we operate globally, we may transfer your information to other countries or jurisdictions. Binding corporate rules manage these transfers. If we make such a transfer, we or our vendors will, as applicable, provide the proper safeguards required by applicable law to ensure that your information is protected. More information on international data transfers of your personal information is below.



Where we share your personal information for our legitimate interests, you can object to this disclosure. Please be aware that when you object to the disclosure of your personal information for Pyramid's legitimate interests it may affect the services we provide to you. More information on your rights is below.

#### **Legally compelled disclosure:**

We will also disclose your personal information when required to do so by law, for example, in response to a court order or a subpoena or other legal obligation, taxation authorities, in response to lawful requests by public authorities, including to meet national security or law enforcement agency's requirements, or in special cases when we have reason to believe that disclosing your personal information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with our rights or property.

#### **International data transfers**

##### **Processing in the US and elsewhere by registration on this site**

Pyramid is a business that operates in the United States of America, Canada, Mexico, the United Kingdom, India, the Philippines, and the EU. We may transfer the personal information we collect about you to recipients, and your personal information may be stored and processed in countries other than the country in which the information was originally collected, including the United States and elsewhere. When we transfer your information to other countries, we will protect your information as described in this policy with respect to data transfers outbound from the European Economic Area (EEA) to the United States:

- Pyramid has executed EU binding corporate rules with respect to personal information collected in the European Economic Area and transferred to Pyramid in the United States and elsewhere.

Pyramid Consulting, Inc. is proud of our compliance, cybersecurity, and data privacy programs. We invite you to contact us to ask questions and find out more about our data management practices.

#### **Disclosure and liability for onward transfer:**

Pyramid is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Pyramid may, as disclosed above in 'Third parties with whom we share your personal information,' transfer personal information onward to third parties. Pyramid remains liable under the privacy shield principles if a third-party processes such personal information in a manner inconsistent with the principles, unless we prove we are not responsible for the event giving rise to the damage.





### Independent recourse of privacy shield complaints:

In compliance with the EU-US and Swiss-US privacy shield principles, Pyramid commits to resolve complaints about our collection or use of your personal information. United Kingdom candidates with inquiries or complaints regarding our privacy shield policy should first contact Pyramid at [dpo@pyramidci.com](mailto:dpo@pyramidci.com).

### Security

Pyramid endeavors to protect the security of your personal information and your choices for its intended use. We use Secure Socket Layers or SSL technology to protect the transmission of sensitive personal information such as your personally identifying information. We store your personal information on a secure server and use systems and procedures that are designed to protect the personal information we collect from unauthorized access, destruction, use, modification, or disclosure.

Although we will take (and require our third-party providers to take) commercially reasonable security precautions regarding your personal information collected from and stored on the site, due to the open nature of the internet, we cannot guarantee that any of your personal information stored on our servers, or transmitted to or from a user, will be free from unauthorized access, and we disclaim any liability for any theft or loss of, unauthorized access or damage to, or interception of any data or communications. By using the site or other Pyramid services, you acknowledge that you understand and agree to assume these risks.

### How long we retain your personal information?

We will only retain the personal information we collect about you for as long as necessary for the purpose for which that information was collected, and to the extent permitted by applicable laws. We take steps to ensure that when we no longer need to use your personal information, we remove it from our systems and records and / or take steps to anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

### Your privacy rights

#### Your right to be forgotten

Pyramid Consulting, Inc. retains candidate and applicant data to comply with laws and regulations across a multitude of jurisdictions, and such data is kept for at least 90 days or longer, based on the last point of contact. Certain data artifacts are required to be retained in keeping with US, Canadian, EU, and other laws and regulations such as racial makeup, age, sex / gender, and credit or criminal records. All candidates residing within or subject to the European Union Jurisdiction may request an "Article 17" action under the GDPR at any time. We will comply within 24 hours. The data we retain will be anonymized, deleted, or obfuscated such that it no longer identifies you in any specific way.



## Your right to request modification or correction of your data

Mistakes happen. If you notice that we have made a mistake in your data, please let us know. You have the right to request a copy of all the data we have about you, and if you notice an error request that we fix it. This process is handled through our Data Protection Officer. You may contact us:

- By telephone, at +1 678 514 3500,
- By following the opt out or unsubscribe instruction contained in the body of any marketing email from us,
- By sending us an e-mail at [dpo@pyramidci.com](mailto:dpo@pyramidci.com), including a copy of the email you have received, and by typing “Remove” in the subject line of your email,
- By mail:  
Pyramid Consulting, Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, Ga. 30022 U.S.

## Marketing communications:

When you register on this site, we may ask you to select whether you would like to receive text, email social media connections, and electronic communications from us such as offers, news, event invitations, and other promotional communications. You may withdraw your consent or opt-out of receiving such communications at any time by contacting us as described below:

- By telephone, at +1 678 514 3500,
- By following the opt out or unsubscribe instructions contained in the body of any marketing email from us,
- By sending us an email at [dpo@pyramidci.com](mailto:dpo@pyramidci.com), including a copy of the email you have received, and by typing “Remove” in the subject line of your email,
- By mail:  
Pyramid Consulting Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, Ga. 30022 U.S.



Additionally, where we process your personal information for our interests you will have the right to object to such processing. Please be aware that where you object to this sort of processing it may affect our ability to conduct tasks as listed in this policy.

You may contact us:

- By telephone, at +1 678 514 3500,
- By following the opt out or unsubscribe instruction contained in the body of any marketing email from us,
- By sending us an email at [dpo@pyramidci.com](mailto:dpo@pyramidci.com), including a copy of the email you have received, and by typing "Remove" in the subject line of your e-mail,
- By mail:  
Pyramid Consulting Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, Ga. 30022 U.S.

Your election not to receive newsletters or promotional and marketing correspondence from us will not: (i) preclude us from corresponding with you, by email or otherwise, regarding your existing or past relationship with us, and (ii) preclude us, including our employees, contractors, agents, and other representatives, from accessing and viewing your personal information in the course of maintaining and improving the site.

#### **Requesting access to your personal information and other rights:**

You may also have the right under applicable law to request to review, access, correct, delete, port, or object to our processing your personal information processed by us and lodge a complaint with a supervisory authority. If so, you may do so by making a request to the DPO You may contact us:

- By telephone, at +1 678 514 3500,
- By following the opt out or unsubscribe instruction contained in the body of any marketing email from us,
- By sending us an email at [dpo@pyramidci.com](mailto:dpo@pyramidci.com), including a copy of the email you have received and by typing "Remove" in the subject line of your email,
- By mail:  
Pyramid Consulting Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, Ga. 30022 US



## Changes to this policy

As a high-growth, global business, Pyramid will continue to assess this policy against new technologies, regulations, laws, services, business practices, and the needs of our customers and candidates. Accordingly, changes to this policy shall be made from time to time as required. Material changes to this policy will result in more prominent notice and may take many forms (such as email, a written hard copy, or updates to our website, as appropriate to regulations, business practices, and customer needs.

## Data Protection Officer

We have appointed a Data Protection Officer (“DPO”) for our global operations to address privacy concerns for our candidates and those who interact with us. If you have any questions or concerns about our personal data policies or practices, you may contact the DPO using the following contact details:

- By telephone, at +1 678 514 3500,
- By following the opt out or unsubscribe instruction contained in the body of any marketing email from us,
- By sending us an email at [dpo@pyramidci.com](mailto:dpo@pyramidci.com), including a copy of the email you have received and by typing “Remove” in the subject line of your email,
- By mail:  
Pyramid Consulting Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, Ga. 30022 U.S.

## Cookie policy — Automatic data collection

By browsing on our site, you agree to our use of cookies.

### What is a cookie?

A cookie is a small text file that a website stores on your personal computer, telephone, or any other device, with information about your navigation on that website. Cookies facilitate browsing and make it more user-friendly. A cookie contains the name of the server it came from, the expiry of the cookie, and a value – usually a randomly generated unique number. Cookies do not give access to nor damage your computer.

### How we use cookies:

We use browser session cookies, which are temporary cookies that are erased from your device’s memory when you close your internet browser or turn your computer off, and persistent cookies, which are stored on your device until they expire unless you delete them before that time. We group browser cookies on our site into three categories, which you can manage through our cookie preference manager:



- **Strictly necessary cookies:** These cookies are necessary to enable the basic features of this site to function, such as identifying you as a valid user, ensuring that no one else can sign on simultaneously with your account from another computer, and helping us serve you better based on your registration preferences. These cookies also allow you to select your cookie preferences.
- **Performance cookies:** These performance tracking cookies help us to track whether an email recipient has completed an event, such as signing up for a free trial for example. Such information is non-personally identified and collected on an aggregate level. We sometimes utilize third-party service providers to help us track the activity within our site and require third parties to comply with all applicable regulations and laws.
- **Functional cookies:** Cookies allow us to analyze your use of the site to evaluate and improve our performance. They may also be used to provide a better customer experience on this site. For example, providing us with information about how our site is used and helping us facilitate any promotions or surveys that we provide.
- **Targeting cookies:** These cookies may be used to share data with advertisers so that the ads you see are more relevant to you, allow you to share certain pages with social networks, or allow you to post comments on our site.

#### **Cookies are not used to store sensitive data:**

The cookies we use do not store sensitive personal information, such as your address, your password, or your credit card data.

#### **Performance tracking**

We sometimes use cookies, as well as tracking technology, such as web beacons, within the promotional emails that we send to our subscribers or advertisements for our site. These performance-tracking devices help us to track whether an email recipient has completed an event, such as signing up for a free trial for example. Such information is non-personally identified and collected on an aggregate level.

We sometimes utilize third-party service providers to help us track the activity within our site. These third parties may use temporary cookies and / or web beaconing technology to facilitate such tracking, but the data would not be tracked in a personally identifiable way.

Third parties whose products or services are accessible on our site may also use cookies, and we advise you to check their privacy policies for information about their cookies and other privacy practices.

If you would like more information about the third-party cookies on our website and to find out more about your choice to not have your information used by third parties, please contact us at [DPO@PyramidCI.com](mailto:DPO@PyramidCI.com).



## Managing your cookie preferences

### Cookie preference manager:

Our preference manager allows you to restrict our use of cookies other than required cookies. If you use our preference manager on a mobile device, we process your device's advertising identifier. When you access our preference manager, persistent cookies will be set by the ad networks listed in our preference manager to honor your preferences if you choose not to receive interest-based advertising. If you clear your browser cookies, this will remove all cookies, including the opt-out cookies set by the companies. You will need to re-access the opt-out tool to reset your preferences. Our cookie only knows your last set of preferences and does not reflect the current state of cookies on your browser.

### Do not track:

Pyramid tracks cookies through your browser unless you proactively disable cookie tracking or use the features of our cookie preference manager.

### Avoiding use of cookies on this site:

If you prefer to completely prevent us from using cookies on your devices, before navigating on this site, you must first disable the use of cookies in your browser and then delete the cookies saved in your browser associated with this site.

### Disabling and preventing further use of cookies:

You may restrict, block, or delete the cookies from this site at any time by changing the configuration of your browser.

### Contact us

You are always free to contact us if you have questions or concerns regarding this policy, have a question or problem related to your use of the site, or wish to exclude your personal information from our direct marketing purposes. Our standard business practice is to retain any communications from our site visitors to help us to serve each of you better.

- You may contact us by emailing [dpo@pyramidci.com](mailto:dpo@pyramidci.com), or
- By writing to us at:  
Pyramid Consulting Inc.  
Attention: Pyramid Data Protection Officer  
3060 Kimball Bridge Rd. Suite 200  
Alpharetta, Ga. 30022 US