



GENERAL DATA PROTECTION REGULATION (GDPR) STATEMENT

Pax8, Inc. (“Pax8”) is committed to protecting the privacy of our users. We may collect personal and non-personal information throughout our business relationship with you as a vendor, partner, or customer so we created this brief GDPR Compliance Statement in order to describe and explain to users our information collection practice. This statement is supplemental to and does not replace our [Privacy Notice](#).

Contact Information

If you have any questions or concerns in connection with Pax8’s information collection practice summarized in this Statement, please send an email to Privacy@Pax8.com stating your questions or concerns. Alternatively, the postal address is:

Pax8, Inc.

Attn: Data Privacy Officer

5500 S. Quebec St., Suite 350

Greenwood Village, CO 80111

The Types of Personal Data That We Collect

Pax8 may collect personal data from individuals from the European Economic Area (“EEA”) who visit our public-facing web site (“EEA Website Visitors”), and individual representatives of our current and potential corporate customers, suppliers and business partners from the EEA (“EEA Business Contacts”). From EEA Website Visitors, Pax8 may collect the individual’s name, phone number, email address, mailing address and IP address. From EEA Website Visitors applying for employment, Pax8 may also collect the individual’s driver’s license number, passport number, social security number, marital status, family member information, financial information and professional career/employment information. From EEA Business Contacts, Pax8 may collect the individual’s name, business phone number, business email address, IP address, company name and company mailing address.

Purposes for the Processing of Personal Data; Legal Basis

Pax8 processes the personal data of EU data subjects for the purposes of:

- Evaluating job candidates for positions for which they have applied;
- Identifying prospective customers, marketing our services, and building our mailing list for information distribution;
- Communicating with corporate business partners about business matters and conducting related tasks for legitimate business purposes;
- Meeting legal or regulatory requirements and Pax8’s internal policies;
- Other purposes disclosed at the time of collection; and
- Processing client data as a data processor (i.e., at the direction of our clients, who are the data controllers).

We process personal data provided by EEA Website Visitors and those applying for employment with Pax8 on the basis of consent you give to Pax8 when you submit the personal data. For all other data subjects, such processing is in the legitimate interest of Pax8 and the respective data subject in order to promote a business relationship.

Recipients of Personal Data

We do not sell, rent, share, or otherwise dispose of the personal data collected to third parties except those that provide services to Pax8 in furtherance of Pax8's business relationship with its EEA Business Contacts or EEA Website Visitors. We may, however, disclose your personal data when required by law or in the good-faith belief that such disclosure is necessary to comply with law.

In addition, as a data processor, Pax8 may be in possession of data that contains information defined as personal data. Pax8 does not process, store, or handle personal data in any other manner other than that directed by the primary data controller or applicable law. Accordingly, Pax8 does not share, uniquely identify, or in any way use personal data for any commercial purpose other than that defined by the controller. In some cases, in accordance with our vendor, partner, or customer agreements, we may disclose personal data with a subcontractor contracted to provide services on our behalf, in order to provide service to our vendors, partners, and customers.

Transfer of Personal Data to a Third Country

Pax8's primary business operations are not in the EEA, and as such personal data collected by Pax8 may be stored or processed in the United States or in another country where Pax8 or its affiliates, subsidiaries, or third-party service providers maintain facilities. Pax8 uses European Commission-approved Standard Contractual Clauses to effectuate the transfer of such data to jurisdictions outside of the EEA. EU data subjects who provide personal data to Pax8 consent to the processing and transfer of that data to the United States and other locations outside of the EEA, including to countries with laws that may not provide the same level of protection of personal data. Pax8 may also execute agreements with third parties for the transfer of personal data outside of the EU using European Commission-approved Standard Contract Clauses.

Retention Period

Personal data is retained by Pax8 no longer than necessary to fulfil the purposes for which it was collected (e.g., to execute obligations to former employees to provide post-employment benefits) or as agreed upon under applicable contracts with clients or business partners.

Access to, Modification and Deletion of Personal Information

For questions about the collection of personal data by Pax8, or to exercise for legitimate purposes the right to access, correct, update, or delete such, as provided under applicable law, please contact the Pax8 [Privacy Center](#) or contact:

Pax8, Inc.

Attn: Data Privacy Officer

5500 S. Quebec St., Suite 350

Greenwood Village, CO 80111

Privacy@Pax8.com

Please help us to keep your data accurate by informing us of any personal data change promptly. There may be cases where restrictions on the amount of information that can be disclosed to data subjects under applicable law (for example, if that would necessarily involve disclosing information about another person). Pax8 is permitted to withhold some types of personal data in certain circumstances, subject to applicable local law requirements. If there is a dispute, please contact the Pax8 privacy officer at the above address. In addition, data subjects have the right to lodge a complaint with a supervisory authority.

Right to Withdraw Consent

Data subjects whose processing is based upon consent may withdraw that consent at any time; however, Pax8 will not be able to provide or continue to provide services or marketing communications to the data subject.

Changes to This Statement

We may update this GDPR Compliance Statement to reflect changes to our practices or applicable laws. If we make any updates, we will notify data subjects by means of a notice on this Statement. We encourage EEA Website Visitors, EEA Business Contacts, and others to periodically review this page for the latest information on our privacy practices.