

DATED: 5 April 2023

1. SCOPE OF THIS NOTICE

This Notice provides information on how Opportuni ('**Company**', '**we**', '**us**' or '**our**') looks after your personal data when you use our websites (including opportuni.co.uk, opportuni.com, bidstats.uk, bidstats.com, and bidnow.co.uk ('**Websites**') regardless of where you visit it from. This Notice also applies to any personal data we process in connection with the services hosted on our Websites, (including our 'BidNow' and 'BidStats' services) ('**Services**').

The Company is the controller and responsible for personal data submitted to the Company and the Websites or generated through browsing of the Websites. If you are:

- located in North America, Opportuni, Inc. is the controller. Opportuni, Inc is a Delaware corporation with an office at 10250 Constellation Boulevard, Suite 1400, Los Angeles, CA 90067; or
- located outside North America, Opportuni AI Ltd is the controller. Opportuni AI Limited is a company registered in England and Wales with company number 12500430 and registered office is at 20-22 Wenlock Road, London, England, N1 7GU.

Should you need to contact us in relation to this Notice, please send your enquiry to us using the contact details below.

Email address: privacy@opportuni.com

Phone: North America: +1 646 661 7684

Outside North America: +44 20 4531 0771

This Notice contains important information about your privacy rights under data protection legislation. Please read this Notice together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

2. THE PERSONAL DATA ABOUT YOU WE COLLECT

In order to allow you to browse our Websites and benefit from our Services, it is necessary that we process certain personal data about you. Such data is defined as information about an individual from which that individual can be directly or indirectly identified. You can find out more about personal data from the section on your legal rights below.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** which includes the details we ask you to provide at registration, i.e., your username, password, and name;
- **Contact Data:** which includes the details we ask you to provide at registration, i.e., your work email address and work phone number;
- **Financial Data:** which includes bank account and payment card details;
- **Transaction Data:** which includes details about payments to and from you and other details of products and services you have purchased from us;
- **Correspondence Data:** which includes any personal data contained in any correspondence you may have with us over the phone, over email or through live chat;

- **Profile Data:** which includes any details about any services or subscriptions made by you, and the preferences you input when subscribing to the Services;
- **Technical Data:** which includes information about the device you use to access our Websites and Services. Please see the 'cookies' section below for further information;
- **Usage Data:** which includes information about how you use our Websites, Services and other products; and/or
- **Marketing and Communications Data:** which includes your preferences in receiving marketing from us and our third parties, and your communication preferences.

Please note we may aggregate and anonymize any of the above types of information. This Notice does not apply to anonymous information which is out of the scope of data protection law.

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

3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you. For example:

- **Directly:** you may give us your Identity, Contact and Correspondence Data by filling in forms or by corresponding with us by phone, email, live chat or otherwise. This includes personal data you provide when you:
 - create an account on our Websites;
 - apply for and use our Services;
 - subscribe to our publications; or
 - request marketing information to be sent to you.
- **Indirectly:** Technical Data, that is information about the device you use, which is recorded and collected by us and our partners when you browse our Websites and use the Services. Please see the 'cookies' section below for further information.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of Contract:** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. Personal data processing is necessary for contractual performance. If you are a company representative, our contract for Services is likely with your employer, in which case we rely on our legitimate interests and those of your employer when it comes to personal data processing.
- **Legitimate Interest:** this means the interest in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for

activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- **Comply with a legal or regulatory obligation:** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.

Generally, we do not rely on consent as a legal basis for processing your personal data other than for the purpose of sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the details given above.

5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Where more than one ground has been set out in the table below and you need information about the specific legal ground on which we are relying to process your personal data, please contact us using the details above.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deliver our Services, which includes setting up and managing user accounts, providing customer support, connecting you with bid writers, delivering emails containing information you have requested.	Identity, Contact, Correspondence, Profile, Financial, Transaction, and Usage Data	The processing is necessary for the performance of a contract between us and you (in the case of sole traders) or the processing is necessary for our legitimate interest, i.e., the performance of a contract between us and the company you represent.
To promote our Services and manage our relationship with customers, which includes us reaching out to customers and prospective customers via phone and email.	Identity, Contact, Correspondence, and Marketing and Communications Data	The processing is necessary for our legitimate interest, i.e., promoting our Services to prospective customers and generating engagement with existing customers. You can object to this processing at any point in time by letting us know your preferences.
To maintain, improve and promote our Websites and Services, which includes processing of data with the help of 'cookies'.	Technical, Profile, and Usage Data	The processing is necessary for our legitimate interest, i.e., maintaining our Websites and providing our Services, or the processing is subject to your consent when data is being processed for improvement and promotion of our Websites.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to receive an explanation of how the processing for the new purpose is compatible with the original purpose, please contact us using the details supplied above.

If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. WHO WE SHARE YOUR PERSONAL DATA WITH

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

Our group companies: Some non-personal or aggregate data may be shared with other companies in our group. This sharing is necessary for the purpose of the legitimate interests that we pursue, i.e., to properly run our business.

Suppliers: Your personal data may be shared with our suppliers (providers) who help us run our business. Our suppliers may process your personal data on our behalf solely in accordance with our instructions and pursuant to a written contract. For example, we use suppliers for webhosting, bid writing, online communication, secure cloud storage, analytics, email delivery, customer relationship management, web fonts and other services. We may also use suppliers such as social media companies and search engines in order to advertise our Services. This is either necessary for the purpose of performing our contract for Services with you or for the purposes of our legitimate interests, i.e., to deliver and promote our Services. When none of the aforementioned applies, we will seek your permission (consent) to share your personal data with a specific supplier.

Professional advisors: We may disclose your personal data to our professional advisors who are usually regulated by a competent authority (lawyers, accountants, etc.), where that proves necessary. This disclosure is necessary for the purposes of the legitimate interests that we pursue, i.e., to properly run our business.

Public authorities: We may disclose your personal data to the court service, regulators, or law enforcement agencies in connection with proceedings or investigations where we are legally compelled to do so. We would do this if we need to comply with a legal obligation or when in pursuit of our legitimate interests, i.e., to protect our business.

Corporate restructuring: If we sell or buy any assets or business, we may disclose your personal data to the prospective seller or buyer of such business or assets. If we are acquired by another business, personal information about our customers will be transferred to the buyer. This disclosure is necessary for the purposes of the legitimate interests that we pursue, i.e., to properly run our business and our business' continued ability to provide our Services.

7. INTERNATIONAL TRANSFERS

If you are located in North America: your personal data is stored electronically on computer systems in the United States; it is managed by our supplier, Amazon Web Services. We do not currently envision that your data will be accessed by staff, stored with, or transferred by, our suppliers in a destination outside the United States, but will update this privacy notice should this be the case. Regardless of location, we will impose data protection safeguards in transit and at rest. Please contact us if you would like further details of the specific safeguards applied to the export of your personal data.

If you are located outside North America: your personal data is stored electronically on computer systems in the United Kingdom with back-up copies in France, Germany and Ireland; it is managed by our suppliers, Amazon Web Services. In certain circumstances your personal data may be accessed by staff, stored with, or transferred by, our suppliers in a destination outside the United Kingdom (**UK**) or the European Economic Area (**EEA**), to areas where data protection laws may be of a lower standard than in the UK or the EEA. Regardless of location, we will impose data protection safeguards similar to those that we deploy inside the UK and the EEA. Where required by applicable law, we will transfer your personal information subject to

European Commission and UK Information Commissioner's Office approved contractual terms or international data transfer agreements that impose equivalent data protection obligations directly on the recipient. Please contact us if you would like further details of the specific safeguards applied to the export of your personal data.

8. DATA SECURITY

We have put appropriate security measures in place to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, or altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to access it. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

As a general rule, we retain customer data for 18 months after an account has remained inactive for six continuous months.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you), for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- the right to request a copy of the personal data we hold about you;
- the right to request that we correct any personal data if it is found to be inaccurate or out of date;
- the right to request that your personal data is erased where it is no longer necessary to retain such data;
- the right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- the right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e., where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means;
- the right, where there is a dispute in relation to the accuracy or processing of your personal data, to request that a restriction is placed on further processing;
- the right to object to our processing of personal data, where applicable i.e., where processing is based on our legitimate interests, or in performance of a task in the public interest/exercise of official

authority; direct marketing or processing for the purposes of scientific/historical research and statistics.

If you wish to exercise any of the rights set out above, please contact us by using the contact details contained in this Notice.

We will likely need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request in order to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. 'COOKIES' ON OUR WEBSITES

Our Websites use 'cookies'. Some of these are essential or functional, while others help us to improve your experience by providing insights into how the site is being used. We may also use 'cookies' for advertising. Some 'cookies' and similar technologies, particularly those that track browsing behavior across the web are perceived by data protection regulators as privacy intrusive. We are, therefore, presenting the below information to our Websites' visitors in order to explain why and how we use this technology. 'Cookies' work with the help of certain online identifiers and typically involve the processing of the following information that is considered personal data:

- internet Protocol (IP) addresses;
- device or mobile IDs and/or device model and type;
- browser information, operating system information, and/or language preferences;
- the location and the preceding and succeeding websites you have visited, including which pages/part/icons on our Websites you interacted with;
- applications you click on and how often; and
- the pages of our Websites you visit, and how long you spend on each page.

Lawful grounds for processing

For the purposes of data protection law, we use the following justifications to process your online identifiers derived from 'cookies':

- we use 'cookies' for the correct, efficient and viable delivery of online content. The processing is necessary for our legitimate interest, i.e., to ensure the availability of our Websites and the delivery of our Services;
- we use 'cookies' for the analysis and optimization of our Websites' performance and engagement. The processing is necessary for the purpose of improving our services and is subject to your permission (consent); and
- we may use 'cookies' for the delivery (including via third parties) of targeted advertising tailored to your interests. The processing is necessary for the purpose of promoting our services and is subject to your permission (consent).

Details of the processing

The following 'cookies' are automatically downloaded on any device used to access our Websites:

Cookie	Domain	Type	Description	Duration
_fbp	.opportuni.com	Advertisement	This cookie is set by Facebook to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising, after visiting the website.	3 Months
Fr	.facebook.com	Advertisement	Facebook sets this cookie to show relevant advertisements to users by tracking user behavior across the web, on sites that have Facebook pixel or Facebook social plugin.	3 months
_ga	.opportuni.com	Analytics	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	2 years
_gid	.opportuni.com	Analytics	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.	1 day
_gat_gtag_UA_125187493_3	.opportuni.com	Analytics	This cookie is set by Google and is used to distinguish users.	1 minute
Edid	.opportuni.com	Critical	Login Referral Information	Session
_cfllb	service.cohere.so	Analytics	This cookie is used by Cloudflare for load balancing.	12 hours

Exercising control

Please exercise your choice with respect to accepting or rejecting non-essential 'cookies' via the pop-up on our Websites.

In addition to the controls provided on our Websites via the pop-up, you can choose to block 'cookies' by activating the settings on your browser that allow you to refuse the setting of all or some 'cookies'. However, if you use your browser settings to block all 'cookies' (including essential 'cookies') you may not be able to

access parts of our Websites. Your browser settings also allow you to delete all 'cookies' stored on your device whenever you wish.

Do Not Track

We use analytics systems and providers that process personal data about your online activities over time and across third-party websites or online services, and these systems and providers may provide some of this information to us. We do not currently process or comply with any web browser's "do not track" signal or similar mechanisms. Additional information

Please see the following guidance on controlling 'cookies':

- a number of websites provide detailed information on 'cookies', including [AboutCookies.org](https://www.aboutcookies.org) and [AllAboutCookies.org](https://www.allaboutcookies.org);
- Google has developed a browser add-on to allow users to [opt-out of Google Analytics](#) across all websites which use it;
- some browsers include a feature known as 'Do Not Track' or DNT. This allows you to indicate a preference that websites should not track you. However, whilst DNT is available in many browsers, websites are not required to recognize its request, so it may not always work. You can get help on how to use DNT in [Microsoft Edge](#), [Mozilla Firefox](#), [Google Chrome](#) and [Opera](#);
- for more information on how private browsing works as well as its limitations, visit the support pages for your browser: [Microsoft Edge](#), [Microsoft Internet Explorer](#), [Mozilla Firefox](#), [Google Chrome](#) and Safari ([IOS \(mobile\)](#) and [desktop](#)); and
- if you are located outside North America, the European Interactive Digital Advertising Alliance website [Your Online Choices](#) allows you to install opt-out 'cookies' across different advertising networks.

Additional steps you can take to protect your privacy online

If you are concerned about online tracking then we can recommend you to:

- set your browser settings to delete all 'cookies' every time you close your browser;
- consider adopting [Global Privacy Control](#);
- install a privacy-friendly browser on your device, such as [Mozilla Firefox](#), [Safari](#), or [Brave](#);
- install anti-tracking and ad-blocking plug-ins on that browser, such as [Ad Block Plus](#), [Ghostery](#) or [PrivacyBadger](#); and
- use privacy-friendly web search engines, such as [Ecosia](#) or [DuckDuckGo](#).

12. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This Notice was last updated on 5 April 2023. Historic versions are archived and can be obtained by contacting us.

Any changes we make to our privacy policy in the future will be posted on this page, and where appropriate, notified to you by email. We therefore encourage you to review it from time to time to stay informed of how we are processing your information.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

